**Before**

**The Public Utilities Commission of Ohio**

In the Matter of the Commission's )

Review of Chapter 4901:1-22, Ohio ) Case No. 12-2051-EL-ORD

Administrative Code, Regarding )

Interconnection Services. )

**Comments of Cleveland Thermal, LLC**

**and its Subsidiaries**

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On October 17, 2012, the Public Utilities Commission of Ohio (“Commission”) issued an Entry in this proceeding seeking comments regarding existing rules as well as proposed modifications to such rules. In the Entry, the Commission also stated:

The Commission is seeking comments on whether the interconnection rules should be expanded by removing the 20 megawatt capacity limit for generating facilities.[[1]](#footnote-1)

The Commission is also seeking comments on whether the interconnection rules should require that the interconnection queue be made publicly available, much like the PJM queue. A publicly available interconnection queue could provide developers and EDUs with greater predictability regarding the feasibility and costs of interconnecting at a certain location.[[2]](#footnote-2)

Cleveland Thermal, LLC and its subsidiaries (“Cleveland Thermal”) owns local district energy systems that efficiently permit consumers to meet their heating or cooling needs. Throughout its history, Cleveland Thermal has been committed to providing consumers with a reliable and efficient energy source that enables buildings to operate at optimal performance levels. This translates into energy savings and sustainable solutions for consumers.

Cleveland Thermal’s business model makes it dependent on innovation and continuously improving the value that consumers can derive from a district energy system. The emergence of abundant and reasonably priced energy resources from shale formations proximate to Ohio has inspired and will further inspire innovation in the use of distributed energy production technologies that offer energy efficiency and reliability improvements. For these reasons, Cleveland Thermal strongly encourages the Commission to remove the 20 megawatt capacity limit for electric generating facilities.

The energy balance of large district heating and cooling systems in industrial, commercial and institutional facilities with the potential of converting to a combined heat and power platform with potential net plant heat rates of 5,000 Btu per kilowatt hour have an electricity potential much greater than 20 megawatts. Thus, the 20 megawatt limitation may effectively (and arbitrarily) suggest that the Commission does not encourage projects that offer the largest efficiency gaining opportunities. Among other things, Section 4928.02, Revised Code, states that the encouragement and “… implementation of distributed generation across customer classes through regular review and updating of administrative rules governing critical issues such as, but not limited to, interconnection standards, standby charges, and net metering …” is part of Ohio’s policy. Section 4928.06(A), Revised Code, states that “… the public utilities commission shall ensure that the policy specified in section 4928.02 of the Revised Code is effectuated …” On balance, the 20 megawatt limitation seems to work against the goals contained in Ohio’s electricity policy and the Commission’s ability to fully effectuate that policy.

In conjunction with removing the 20 megawatt capacity limitation, Cleveland Thermal requests that the Commission’s rules: (1) recognize interconnection protocols applicable to 20 megawatt and above generating facilities that are adopted by the applicable regional transmission organization or applicable reliability organization; (2) encourage coordination for the purpose of streamlining the evaluation and implementation of the interconnection process; and, (3) use its good offices to facilitate the integration of distributed energy production technologies that offer energy efficiency and reliability improvements. To this end, Cleveland Thermal believes it would be helpful to require interconnection queue information to be accessible by the public.

Respectfully submitted,

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#### Certificate of Service

I hereby certify that a copy of the foregoing *Comments of Cleveland Thermal, LLC and its Subsidiaries* was served upon the following parties this 19th day of November 2012, *via* electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.

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1. Entry at 4 (October 17, 2012). [↑](#footnote-ref-1)
2. *Id*. [↑](#footnote-ref-2)