BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Review of Chapter 4901:1-11, Ohio Administrative Code, Regarding Interconnection Services.	)))	Case No. 12-2051-EL-ORD

SUPPLEMENTAL COMMENTS OF DUKE ENERGY OHIO, INC.

Duke Energy Ohio, Inc. (Duke Energy Ohio) submits the following comments in response to the Public Utilities Commission of Ohio (Commission) request for supplemental comments related to proposed changes to Chapter 4901:1-22, Interconnection Services.

I. Comments with respect to the table on page 2:

Staff recommends that Level 2 expedited review procedure, as set forth in proposed Rule 4901:1-22-07, O.A.C., be revised to incorporate a new method of establishing eligibility. In response to the table proposed by Staff, Duke Energy Ohio offers the following suggested changes.

Line Voltage	**Fast Track Eligibility-regardless of location**	**Fast Track Eligibility- on a 600 amp line and < 2.5 feeder miles from substation**
< 5kV	~~< 1MW~~ ≤ 100 kW	< 2 MW
5kV ≤ 15 kV	~~< 2MW~~ ≤ 500 kW	< 3 MW
15 kV ≤ 30 kV	~~< 3MW~~ ≤ 1 MW	< 4 MW
30 kV ≤ 69 kV	~~< 4MW~~ ≤ 2.5 MW	< 5 MW

As to the fast track eligibility "regardless of location," most generators this large are going to fail other screens, especially at lower voltages. A 1 MW generator on the Duke Energy Ohio 4.16 kV system is likely to cause a large enough rise for the voltage to go outside ANSI C84.1 Range A. On a 4.16 kV feeder, a 1 MW generator is almost certain to exceed "100% of minimum section load" and may even exceed the feeder rating. Therefore Duke Energy Ohio proposes the above alternative levels if this table is to be used.

Regarding fast track eligibility "on a 600 amp line," the highest rated 4.16 kV feeders on the Duke Energy Ohio system are rated 500 A, and there are only two 4.16 kV feeders rated this high.

Comments on item (5,) pages 2 and 3:

Supplemental review need not be as formalized a process as that in the Federal Energy Regulatory Commission (FERC) Small Generator Interconnection Procedures (SGIP). If a generator fails one or more of the Level 2 screening criteria, the electric distribution utility (EDU) and the customer can discuss these items and the reasons for the failures before agreeing to put the Level 3 Standard Review into action.

Comments on item (6,) pages 3 and 4:

Studies done internally show that 100 percent of minimum section load is closer to 20% of peak than 30%. Therefore, Duke Energy Ohio proposes that the screen set the threshold for aggregate generation capacity on the circuit at 20 percent of peak load, absent minimum load data.

Please note that although the screen of 100 percent minimum section load and 30 percent of peak has been proposed as a change to California Rule 21, the recent changes to California Rule 21 kept the original screen of 15 percent of peak. It is also worth noting that the electric distribution system is not, and should not be operated under the same parameters and procedures as the transmission system.

Comments on 4901:1-22-07 (E) Level 2 supplemental review, Appendix A

As mentioned in the comments above, this type of review can be done on a less formal basis and discussed with the customer before agreeing to the Level 3 Standard Review.

(1)(a) As mentioned in the comments above, 20 percent of peak is a more realistic estimate than 30 percent for minimum section load.

(1)(a)(iii) Aggregate generation should consider all generation on the circuit, not just the net export value, in order that the aggregate generation will not exceed the capacity of the line.

Comments on 4901:1-22-04 (B) Pre-Application, Appendix B

(2) The proposed fee should take into account the amount of time it takes to amass this information, as well as the typical person-hour cost to the EDU for an engineer.

(3)(a) There may be more than one possible source to serve the site, which could make multiple reports necessary.

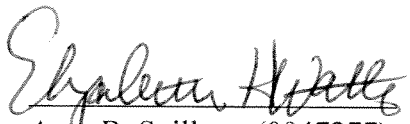
(3)(c) With changes to the distribution system over time, by the time the generation facility gets built, much of this information may be irrelevant.

(3)(d) This value is the result of a calculation subtracting the sum of (3)(b) and (3)(c) from (3)(a). It is not necessary for the EDU to provide this value.

(4) A refund of $25 for every item of unavailable data negates the aforementioned idea that this is a flat, nonrefundable fee.

Duke Energy Ohio appreciates this opportunity to provide supplemental comments regarding Staff's proposed changes to the interconnection rules.

Respectfully submitted,



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