

**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**

---

Samuel C. Randazzo  
Scott Elisar  
McNees Wallace & Nurick LLC  
21 East State Street, Suite 1700  
Columbus, OH 43215-4228  
Telephone: 614-469-8000  
Telecopier: 614-469-4653  
sam@mwncmh.com  
selisar@mwncmh.com

**November 19, 2012**

**Attorneys for Cleveland Thermal, LLC and  
its Subsidiaries**

**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**

---

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.<sup>1</sup>

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.<sup>2</sup>

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

---

<sup>1</sup> Entry at 4 (October 17, 2012).

<sup>2</sup> *Id.*

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,

/s/ Samuel C. Randazzo  
Samuel C. Randazzo  
Scott Elisar  
McNees Wallace & Nurick LLC  
21 East State Street, Suite 1700  
Columbus, OH 43215-4228  
Telephone: 614-469-8000  
Telecopier: 614-469-4653  
sam@mwncmh.com  
selisar@mwncmh.com

**Attorneys for Cleveland Thermal, LLC and  
its Subsidiaries**

## **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 19<sup>th</sup> day of November 2012, *via* electronic transmission, hand-delivery or first class U.S. mail, postage prepaid.

/s/ Samuel C. Randazzo

Samuel C. Randazzo

James Landers P.E.  
Fosdick & Hilmer, Inc.  
Consulting Engineers  
309 Vine Street, Suite 50  
Cincinnati, OH 45202

William Wright  
Chief, Public Utilities Section  
Thomas McNamee  
Assistant Attorney General  
180 E. Broad Street, 6<sup>th</sup> Floor  
Columbus, OH 43215-3793  
william.wright@puc.state.oh.us  
thomas.mcnamee@puc.state.oh.us

### **COUNSEL FOR THE STAFF OF THE PUBLIC UTILITIES COMMISSION OF OHIO**

Bryce A. McKenney  
Attorney Examiner  
Public Utilities Commission of Ohio  
180 East Broad Street, 12<sup>th</sup> Floor  
Columbus, OH 43215  
bryce.mckenney@puc.state.oh.us

### **ATTORNEY EXAMINER**

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**11/19/2012 2:48:31 PM**

**in**

**Case No(s). 12-2051-EL-ORD**

Summary: Comments of Cleveland Thermal, LLC and its Subsidiaries electronically filed by Mr. Samuel C. Randazzo on behalf of Cleveland Thermal, LLC