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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's Review
of Chapter 4901:1-22, Ohio Administrative
Code, Regarding Interconnection Services.

CASE NO. 12-2051-EL-ORD
Comments of Recycled Energy Development

Recycled Energy Development (RED) appreciates the opportunity to comment on the Commission's proposed changes to interconnection standards and procedures. Based near Chicago, RED is interested in financing, developing, and operating waste-energy-recovery and combined-heat-and-power projects in Ohio, and, therefore, has an interest in connecting those projects to the electricity grid. We want to focus our comments on only two of the issues raised in the Commission's Entry.

We commend the Commission for seeking to streamline interconnection procedures. The proposed three-level process seems reasonable, although we see no justification for limiting the level-three review to projects smaller than twenty megawatts of capacity. Any arbitrary size limitation distorts the market and reduces opportunities to advance projects that would bring both economic development and environmental quality to Ohio.

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On a separate issue, we support the Commission's proposal to require a publicly available interconnection queue. Such transparency would help both developers and EDUs predict the feasibility of interconnecting at a certain location.

Thank you for considering these comments from Recycled Energy Development.