

**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 OHIO EDISON COMPANY,
THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, AND
THE TOLEDO EDISON COMPANY**

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I. INTRODUCTION

Pursuant to the Commission's Entry of October 17, 2012, Ohio Edison Company ("Ohio Edison"), The Cleveland Electric Illuminating Company ("CEI"), and The Toledo Edison Company ("Toledo Edison") (collectively, the "Companies"), respectfully file their comments to several Staff questions contained in the Commission Entry and recommended amendments to rules contained in Chapter 4901:1-22 of the Ohio Administrative Code ("O.A.C."). The Companies appreciate the opportunity to comment and acknowledge the hard work of the Staff reflected in the proposed rules. The Companies respectfully request the Commission consider their responses and comments and appropriately modify and/or add the proposed rules.

II. FACTORS TO CONSIDER

Pursuant to O.R.C. 119.032, the Commission must consider the following factors when it reviews the rules and whether the rules should be amended, rescinded or continued without change:

- (a) Whether the rules should be continued, without amendment, be amended or be rescinded, taking into consideration the purpose, scope and intent of the statute under which the rule was adopted;
- (b) Whether the rule needs amendment or rescission to give more flexibility at the local level;
- (c) Whether the rule needs amendment to eliminate unnecessary paperwork; and
- (d) Whether the rule duplicates, overlaps with, or conflicts with other rules.

Additionally, pursuant to the Governor's Executive Order 2011-01K, the Commission must:

- (a) Determine the impact that a rule has on small businesses;

- (b) Attempt to balance the critical objections of regulation and the cost of compliance by the regulated parties; and
- (c) Amend or rescind rules that are unnecessary, ineffective, contradictory, redundant, inefficient, or needlessly burdensome, or that have had negative unintended consequences, or unnecessarily impede business growth.

In presenting their comments to the proposed rules, the Companies will attempt to address those factors when appropriate.

III. COMMENTS REQUESTED BY THE COMMISSION

1. Paragraph (8)

In paragraph (8) of the Entry, Staff proposed revising the application process to a three level process. The Companies believe the Staff's proposed changes will simplify and expedite the interconnection process and therefore support the proposed change.

2. Paragraph (9)

In this paragraph, Staff is seeking comments on whether an interconnection rule recognizing standard procedures for field-tested equipment would quicken the interconnection review process. Specifically, interconnection equipment would be considered field-tested if the utility has previously approved interconnection equipment for use in its service territory that is identical to the interconnection equipment being proposed.

The Companies respectfully submit that there is no way of knowing that previously tested customer generation equipment is identical to other generation equipment without proper certification or proper field testing of each unit. Performance of such units can be affected by unknown variations or modifications having previously taken place. The comment in paragraph 9 suggesting that non-listed customer equipment should be universally accepted without field testing each unit would require an unsafe

practice; therefore, the Companies respectfully suggest this proposal not be pursued as a rule change.

3. Paragraph (10)

The Commission is seeking comments on whether the interconnection rules should create a framework for minimizing financial risk associated with the design, procurement, and installation of infrastructure modifications for interconnections. Specifically, should the rules be revised to specify certain types of financial security instruments that could be posted by an applicant to guarantee that the EDU's interconnection-related costs are covered as they accrue.

The Companies agree with the anticipated benefits of the proposed revisions for the posting of security instruments and therefore do not oppose such revisions as proposed in this paragraph.

4. Paragraph (11)

The Commission is seeking comments on whether the interconnection rules should be expanded by removing the 20 megawatt capacity limit for generating facilities.

The Companies are not aware of ever having received a request in excess of 20 megawatts. Given that installations this large may well have a substantial impact upon the operation and reliability of the distribution system, the Companies respectfully submit that the much preferred approach would be to leave the current limit in place. In the unlikely event that a request is made for interconnection of a facility of more than 20 megawatts, electric utilities could work individually with that customer to ensure that such a facility could be installed in a safe and mutually acceptable manner that did not negatively affect the operation or reliability of the distribution system. But the general

rules related to interconnections should not be relied upon for such interconnection requests.

5. Paragraph (12)

In this paragraph, the Commission is seeking comments on whether the interconnection rules should require that the interconnection queue be made publicly available, much like the PJM queue.

The Companies respectfully submit that the development of a publicly available interconnection queue would be unduly burdensome to create and to administer, and raises customer privacy concerns. Moreover, the vast majority of interconnection projects among the Companies are of smaller size (less than 10 kW) and so such a queue would seem to provide very limited benefits for predicting feasibility and costs compared to the current methods used by developers and customers. Given the low benefit-to-cost ratio, the Companies respectfully request that this concept not be included as a proposed rule.

IV. PROPOSED REVISIONS

1. 4901:1-22-07(B)(3)

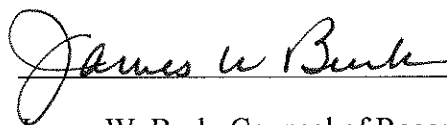
Staff proposed the deletion of this paragraph, which requires compliance with IEEE 1547 and Underwriters Laboratory 1741 standards in order to qualify for Level 2 review.

The Companies respectfully suggest that the proposal to delete this paragraph should be rejected as eliminating this rule provision would undermine the safety of interconnections. The IEEE 1547 and Underwriters Laboratory 1741 standards are accepted safety standards that must be adhered to for the safety of the public, customers

and the Companies' employees. This rule provision should be retained as it provides a universal safety standard that employees and contractors are familiar with and typically operate under. Further, retaining this paragraph has the added benefit of making clear to customers and developers that the lack of UL certification will result in a Level 3 review. This serves to help avoid customer and developer confusion when dealing with projects.

V. CONCLUSION

The Companies appreciate the Commission Staff's efforts to improve the Commission's interconnection rules. The Companies have offered the foregoing comments and requested changes to the Commission's rules to further improve upon Staff's efforts to make the interconnection process more user-friendly and efficient, while maintaining safety standards and reliable operation of the distribution system. The Companies urge the Commission to adopt the recommendations of the Companies set forth above.


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Summary: Comments electronically filed by Ms. Carrie M Dunn on behalf of The Cleveland Electric Illuminating Company and Ohio Edison Company and The Toledo Edison Company