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November 19, 2012

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3793

**Subject: Case No. 12-2051-EL-ORD**

To Whom It May Concern:

In the Matter of the Commission's Review of Chapter 4901:1-22, Case No. 12-2051-EL-ORD, we have the following comments regarding the draft rules:

1. We would retain the Level 2 approved criteria that includes reference to IEEE 1547 and Underwriters Laboratory 1747 standards. Inclusion of this provision justifies and supports an expedited review and approval for generation equipment that is pre-certified in compliance with these specific industry standards.
2. We agree with and endorse the clarification of interconnection at Three Phase, Four Wire as noted in proposed change to Level 2 approved criteria.
3. We recommend and support an expedited process and pre-approval for inverter based, microturbine power systems that are type tested and certified by Underwriters Laboratory under applicable standards, including 1741 and 2200. An example of expedited review and pre-approval may be found in New York interconnections rules – please refer to the following site: <http://www3.dps.ny.gov/W/PSCWeb.nsf/All/DCF68EFCA391AD6085257687006F396B>
4. While these interconnection procedures apply to a radial distribution circuit, we encourage the PUCO to consider area and spot network applications that are in compliance with IEEE 1547.6 standards.

Submitted by,

David R. Blair, P.E.  
Senior Vice President

DRB/cp

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

Summary: Comments Comments in regard to the commission's review of chapter 4901:1-22  
electronically filed by Mr. David R Blair on behalf of GEM Energy and Mr. David R Blair