

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for Certification :  
As an Ohio Renewable Energy Resource Generating : Case No. 14-2187-EL-REN  
Facility for Boone National Guard Center Building 169 :

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**REVIEW AND RECOMMENDATION**  
SUBMITTED ON BEHALF OF THE STAFF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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**CASE HISTORY**

The Kentucky Army National Guard (Applicant) filed an application for certification of a renewable energy resource facility on December 15, 2014. The name of the facility is Boone National Guard Center Building 169 (facility), located at 100 Minuteman Parkway, Frankfort, KY, 40601. The facility is owned by the Applicant, 100 Minuteman Parkway, Frankfort, KY, 40601.

According to the application, the facility is a roof-mounted solar PV installation. Comprised of 134 solar modules rated at 300 watts/per, the facility has a total capacity of 40.2 kilowatts. The application indicates that the facility was placed in-service in February 2014.

On December 19, 2014, Staff sent the Applicant a question related to the application. The Applicant filed its response on January 28, 2015. Staff asked the Applicant an additional question, with the answer to this second question having been docketed on April 14, 2015. An Entry was issued that suspended the automatic approval process for this application.<sup>1</sup>

**STAFF REVIEW**

The Staff's review of applications for certification of a renewable energy resource facility consists primarily, but not exclusively, of three items: (1) the deliverability of the facility's output to the state of Ohio, (2) the resource/ technology used at the facility, and (3) the facility's placed in-service date.

**1) Deliverability**

Qualified renewable facilities must be located in Ohio, or their output deliverable to Ohio, in order to be eligible.<sup>2</sup> The Ohio Administrative Code (OAC) provides further guidance on this topic where it defines "deliverable into this state" as the following:

That the electricity originates from a facility within a state contiguous to Ohio. It may also include electricity originating from other locations, pending a demonstration that the electricity could be physically delivered to the state.<sup>3</sup>

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<sup>1</sup> Entry dated 2/12/15

<sup>2</sup> ORC 4928.64(B)(3)

This facility is located in Kentucky and is grid-connected. Therefore, Staff concludes that this facility satisfies the deliverability provision of the statute.

## 2) Resource/Technology

For purposes of the state's renewable portfolio standard (RPS), qualified renewable energy resources are defined by statute.<sup>4</sup> According to the current statute, renewable energy resources include, but are not limited to, solar photovoltaic (PV) systems. Therefore, Staff concludes that this solar PV facility represents a resource or technology that is eligible for certification as a renewable facility under the RPS.

## 3) Placed In-Service Date

The Applicant indicated a placed in-service date for the facility of February 25, 2014. The Applicant further indicated in its application that it is not a mercantile customer. As such, the facility must satisfy one of the following statutory provisions as it pertains to the placed in-service date:

- Is a renewable energy resource created on or after January 1, 1998, by the modification or retrofit of any facility placed in service prior to January 1, 1998.<sup>5</sup> OR
- Has a placed in-service date of January 1, 1998, or after.

With a February 2014 in-service date, Staff concludes that the solar PV facility satisfies the statutory placed in-service requirement under the RPS.

## 4) Additional Considerations

- (a) For electric generating facilities, Commission rules require that facilities above 6 kW measure their renewable output with a utility-grade meter.<sup>6</sup> The facility meter described in the application satisfies this rule requirement.
- (b) The Applicant confirmed that there is a current Department of Defense policy that prohibits the Applicant from selling the solar renewable energy credits (S-RECs) associated with the facility. However, the Applicant is seeking certification of the facility in the event that they are able to sell such S-RECs in the future.<sup>7</sup>

## STAFF RECOMMENDATION

Staff recommends that the Commission certify the solar PV installation at the Boone National Guard Center Building 169.

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<sup>3</sup> OAC 4901:1-40-01(I)

<sup>4</sup> ORC 4928.01(A)(37)

<sup>5</sup> ORC 4928.64(A)(1)

<sup>6</sup> OAC 4901:1-40-04(D)(1)

<sup>7</sup> Applicant response to Staff second question, filed 4/14/2015

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Summary: Staff Review and Recommendation electronically filed by Mr. Stuart M Siegfried on behalf of PUCO Staff