

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of the)
Dayton Power and Light Company for)
Approval of Amended Tariff proposed to)
Modify its Electric Distribution Service)
Sheet No. D35, Interconnection Service)**

Case No. 14-1181-EL-ATA

Findings and Recommendations of the PUCO Staff

I. Statutory Background

On December 4, 2013, the Public Utilities Commission of Ohio (PUCO) adopted amended rules for electric generator interconnection service and standards, in accordance with 4928.11(A), Ohio Revised Code (ORC), and the State of Ohio’s 5-year rule review procedures. The amended rules, which are found in Chapter 4901:1-22, Ohio Administrative Code (OAC), subsequently became effective on July 10, 2014.

Specifically, 4928.11(A), ORC provides:

For the protection of consumers in this state, the public utilities commission shall adopt rules under division (A) of section 4928.06 of the Revised Code that specify minimum service quality, safety, and reliability requirements for noncompetitive retail electric services supplied by an electric utility in this state, to the extent such authority is not preempted by federal law. The rules shall include prescriptive standards for inspection, maintenance, repair, and replacement of the transmission and distribution systems of electric utilities; shall apply to each substantial type of transmission or distribution equipment or facility; shall establish uniform interconnection standards to ensure transmission and distribution system safety and reliability and shall otherwise provide for high quality, safe, and reliable electric service; shall include standards for operation, reliability, and safety during periods of emergency and disaster; and shall include voltage

standards for efficient operation of single-phase motors. The rules regarding interconnection shall seek to prevent barriers to new technology and shall not make compliance unduly burdensome or expensive. When questions arise about specific equipment to meet interconnection standards, the commission shall initiate proceedings open to the public to solicit comments from all interested parties. Additionally, rules under this division shall include nondiscriminatory metering standards.

According to 4901:1-22-02(B), OAC, the interconnection service tariff filing requirement of each PUCO-regulated Electric Distribution Utility (EDU) in the State of Ohio is as follows:

4901:1-22-02(B), OAC provides:

Each EDU in the state of Ohio shall file uniform interconnection service tariffs for commission review and approval pursuant to division (A) of section 4928.11 of the Revised Code that includes the procedures and technical requirements set forth in this chapter for interconnection service on a first-come, first-served basis.

The findings and recommendations in this document pertain to interconnection service tariff that has been filed by the Dayton Power and Light Company (DP&L or Company), in response to the amended rules.

II. Company Filing Summarized

DP&L filed an application to modify its interconnection service tariff on July 10, 2014. The Company included a red-line of its current tariff and a clean version of the proposed tariff in its filing.

The Company filed an amended interconnection tariff on October 28, 2014, following discussions with PUCO Staff (Staff) about its July 10, 2014, tariff filing.

III. Filed Comments

No persons filed comments in this proceeding.

IV. Staff Findings

Following its review of DP&L's proposed interconnection service tariff and any timely comments submitted in this proceeding, Staff makes the following findings:

- (1) That DP&L is an electric distribution utility in Ohio, and therefore the Company had a tariff filing obligation in response to amended Ohio interconnection service rules.
- (2) That the Company initially filed its interconnection tariff on July 10, 2014. The Company subsequently filed an amended tariff on October 28, 2014, which reflects the amended rules more closely.
- (3) That following a review of the Company's amended tariff, Staff confirmed that the Company has satisfied for the most part, its interconnection service tariff filing requirement.
- (4) That the Company's amended tariff is inconsistent with respect to potential interconnections to the Company's transmission system. The applicability section¹ of the tariff sheet precludes interconnection at the transmission-level, whereas the Level 3 standard review procedure² as detailed in the tariff and the rules takes into consideration the review of such interconnection applications.

V. Staff Recommendations

Following its review of the information submitted in this proceeding and other relevant data, Staff recommends the following:

- (1) That DP&L has satisfied its interconnection service tariff filing requirement, with the exception of an inconsistency in the review eligibility of transmission-level interconnections.
- (2) That the Company should file revisions to its amended interconnection tariff that would ensure a consistent approach to transmission-level interconnections throughout the tariff by removing the following sentence under the section entitled, "APPLICABLE," on page 1 of its tariff sheet: "This Tariff Sheet is not applicable for customers who want to interconnect to the Company's transmission system."

¹ Company amended tariff filed on October 28, 2014, Page 1 of 29

² Company amended tariff filed on October 28, 2014, Page 20 of 29

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Summary: Staff Review and Recommendation electronically filed by Ms. Mahila Christopher on behalf of PUCO Staff