

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application for Certification | : | |
| As an Ohio Renewable Energy Resource Generating | : | Case No. 17-0300-EL-REN |
| Facility for the Jones, Bruce and Heidi Residence - | : | |
| B and H Jones | : | |

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

CASE HISTORY

On behalf of Bruce and Heide Jones (Applicant), SRECTrade (Applicant's representative) filed an application for certification of a renewable energy resource facility on February 1, 2017. The name of the facility is Jones, Bruce and Heidi Residence – B and H Jones (Facility), located at 5770 State Rd 39, Martinsville, IN, 46151. The Facility is owned by the Applicant, 5770 State Rd 39, Martinsville, IN, 46151.

According to the application, the Facility is a 10.62 kilowatt (kW) ground-mounted solar photovoltaic (SPV) system that was placed in-service on December 27, 2016.

On February 8, 2017, Staff sent the Applicant's representative a question related to the Facility's meter as described in the application. An Attorney Examiner issued an entry dated March 17, 2017, that suspended the automatic approval process for this application. The Attorney Examiner entry further indicated that, absent a response to Staff's question within 30 days of the entry, the application may be dismissed. To date, no additional meter information has been provided.¹

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.² The Ohio Administrative Code (Ohio Admin. Code) provides further guidance on this topic where it defines "deliverable into this state" as the following:

¹ An email from the Applicant's representative received on April 25, 2017, indicated that no updates were available at the time.

² R.C. 4928.64(B)(3)

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.³

This residential SPV system is located in Indiana and is interconnected with South Central Indiana REMC. Therefore, Staff concludes that the Facility satisfies the deliverability provision of the statute.

2) Resource/Technology

The Facility is a ground-mounted SPV system, with SPV specifically listed in the statutory definition of a renewable energy resource.⁴ Staff concludes that the Facility represents a resource or technology that is eligible for certification as a renewable facility under the renewable portfolio standard.

3) Placed In-Service Date

The application indicates that the Facility was placed in-service on December 27, 2016. Staff concludes that the Facility satisfies the on or after January 1, 1998, statutory placed in-service requirement.⁵

4) Additional Considerations

- (a) Commission rules require that facilities above 6 kW measure their renewable output with a utility-grade meter in order to be eligible for certification.⁶ As the Facility is 10.62 kW, this Commission rule is applicable.

The application indicates that the Facility's SPV output would be measured by a "... revenue grade inverter that will be used to report production to GATS."

While certain inverter-based systems may be capable of satisfying the revenue grade meter definition, there are many inverters that currently are not sufficient to meet this requirement. Staff sought documentation from the Applicant's representative that the referenced inverter would satisfy the revenue grade meter definition in Commission rule. To date, neither the Applicant nor its representative have provided any documentation that would demonstrate that the inverter complies with the applicable Commission rule.

At this point, Staff has insufficient information to confirm that the Facility's inverter described in the application satisfies this rule requirement.

- (b) The facility must be registered with either M-RETS or PJM EIS' GATS, the two attribute tracking systems currently recognized by the Commission. According to the application, the Facility would be registered with GATS.

³ Ohio Admin. Code 4901:1-40-01(I)

⁴ R.C. 4928.01(A)(37)

⁵ R.C. 4928.64(A)

⁶ Ohio Admin. Code 4901:1-40-04(D)(1)

STAFF RECOMMENDATION

Because the Facility is larger than 6 kW and the Applicant hasn't adequately demonstrated that the Facility satisfies the meter requirements for certification, Staff recommends that the Commission deny this application for certification.

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