

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the PowerForward                    )  
Distribution System Planning Workgroup.    )    Case No. 18-1596-EL-GRD

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**COMMENTS ON DISTRIBUTION PLANNING BY THE ENVIRONMENTAL LAW &  
POLICY CENTER, ENVIRONMENTAL DEFENSE FUND, NATURAL RESOURCES  
DEFENSE COUNCIL, AND OHIO ENVIRONMENTAL COUNCIL**

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Interested parties the Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Ohio Environmental Council (collectively, “Environmental Commenters”) hereby file these comments in response to the November 14, 2018 Entry in this case soliciting comments on “the proposed current-state assessment of the EDU’s respective distribution systems’ present capability to integrate and accommodate the broad array of EDU and non-EDU initiatives, and the proposed filing date of April 1, 2019.” Entry at 3. The Environmental Groups share the view articulated by the Public Utilities Commission of Ohio (“Commission” or “PUCO”) in its August 29, 2018 report *PowerForward: A Roadmap to Ohio’s Electricity Future* (“Roadmap”) that the modern electric grid should in fact provide a viable “platform” that facilitates the integration of, and recognizes the value of, distributed energy resources (“DERs”) that are increasingly available to customers. Roadmap at 14-25. We provide the below comments to provide our perspective on the most expeditious and effective pathway for realizing customer benefits in line with this vision.

A key element of the Roadmap’s “platform” model is a move toward “integrated distribution planning” (“IDP”) in which “utility distribution systems will integrate and responsibly accommodate non-utility assets.” Roadmap at 18. The Roadmap appropriately

states that an “essential first step” in this transition is for each EDU to file current-state assessment reports that “identify areas of strength and weakness, highlighting those areas in which the distribution system is lacking the necessary infrastructure to assure the provision of adequate and reliable service in a more decentralized environment characterized by a proliferation of DERs, as well as how much visibility the EDUs have into their own distribution systems.” *Id.*

The Environmental Commenters support the Commission’s proposed concept for the current-state assessment, including the specific elements and system characteristics proposed in the Roadmap. *Id.* at 18. We do suggest one clarification of the item regarding “[e]xisting DERs (all types) connected to the distribution system,” to ensure this includes information that each EDU has about the penetration levels of behind-the-meter technologies that may be relevant to load management, including smart thermostats and smart hot water heaters, as well as electric vehicles. Although we realize the EDUs may not have uniformly detailed information about current penetration levels of these types of technologies, we believe it is likely that they will be able to provide at least some information from energy efficiency potential studies or other market surveys. The Environmental Commenters view load management through approaches such as demand-response programs, managed charging, or time-varying prices as a type of distributed energy resource that EDUs may be able to use as non-wires alternatives in an IDP process to reduce customer costs. Accordingly, having the EDUs provide available information about the existence of such DER capabilities in their respective distribution systems will be useful to identify sensible next steps in transitioning to an IDP model.

The Environmental Commenters also propose that one additional element be included in the current-state assessment reports aimed at ensuring distribution planning efforts are consistent

with ongoing developments in the wholesale market: a description of whether any existing or proposed time-of-use rates or demand response programs would qualify as either Price Responsive Demand or a Peak Shaving Adjustment Plan under applicable PJM agreements and manuals. PJM Reliability Assurance Agreement, Schedule 6.1; PJM Manual 19, Attachment D. Both of these PJM constructs recognize the role that peak-shaving, either through time-varying rates or demand response programs, can play in meeting capacity needs at the wholesale level. To the extent the same types of programs may be used to address distribution system needs through integrated distribution planning, the Environmental Commenters believe it is important to identify whether there are potential synergies that EDUs can achieve in reducing wholesale costs for customers through the same mechanisms.

Finally, we urge the Commission – either prior to, or immediately following, the filing of the EDU current-state assessment reports – to articulate an explicit timeline in which the planned Distribution System Planning Working Group (PWG) will review and incorporate the information set out in the reports for the next stage of IDP as contemplated in the Roadmap. *See* Roadmap at 19, 38. Such a timeline is important for the Commission to carry out the clear directives for the PWG working group, consistent with the Roadmap’s statement that, “[g]iven the speed with which technology is developing, effective IDP must be both substantively prescriptive in order to provide an articulated action plan, yet procedurally flexible to enable timely adjustment to change.” Roadmap at 18. Consistent with this approach, the Roadmap outlines a series of specific tasks for the PWG to address regarding the future of Ohio’s distribution grid, derived from the framework recommended in PowerForward Phase 3 by Curt Volkmann, an independent expert with a long career in distribution engineering. The Environmental Commenters concur with this list of initial considerations to inform an

“articulated action plan,” including analysis of future DER customer adoption scenarios, modifications to interconnection standards, development of suitability criteria and options for procuring non-wires alternatives (“NWAs”), defining use cases for hosting capacity analyses, and transparency in sharing this data on public platforms. Entry ¶ 4 (Nov. 14, 2018); Roadmap at 19, 38 (citing Curt Volkmann, *Integrated Distribution Planning: A Path Forward* (2018) at 35, available at [https://gridlab.org/s/IDP-Whitepaper\\_GridLab.pdf](https://gridlab.org/s/IDP-Whitepaper_GridLab.pdf)). A concrete timeline is the missing piece still needed to provide the impetus for the PWG to expeditiously move forward to accomplish these tasks.

Mr. Volkmann proposed such a timeline in his presentation to the Commission, providing his expert view that a working group could address key topics including NWA pilots, hosting capacity analyses, and IDP data portals within 12-24 months of the EDU current-state reports. Curt Volkmann, *Integrated Distribution Planning (IDP) – A Path Forward for Ohio* (Mar. 6, 2018) at 15, *available at* <https://www.puco.ohio.gov/index.cfm?LinkServID=A1B0AD6F-5056-B562-E1F654EDA74021E5>. The Environmental Commenters recommend that the Commission adopt this recommendation as an initial timeline for how stakeholders should begin to act on the information in the current-state assessment reports. While additional stakeholder input to this timeline is of course important, some reasonable pathway for action is necessary to ensure the Commission, the EDUs, and interested stakeholders move forward in a deliberate and timely manner to develop and incorporate the next steps of IDP consistent with the Roadmap recommendations as soon as the reports are filed in April. This approach will accomplish the critical step identified by the Commission of ensuring the distribution system has the “necessary infrastructure to assure the provision of adequate and reliable service in a more decentralized environment characterized by a proliferation of DERs.” Roadmap at 18. The Commission’s

establishment of the PWG as a transparent and open forum has provided a key venue for implementing the Roadmap's recommendations regarding IDP, and adding a timeline will help provide clarity in the Commission's vision for next steps in this process.

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Respectfully submitted,

/s/ Madeline Fleisher  
Madeline Fleisher  
Environmental Law & Policy Center  
21 West Broad St., 8th Floor  
Columbus, OH 43215  
(614) 569-3827  
[mfleisher@elpc.org](mailto:mfleisher@elpc.org)

*Counsel for the Environmental Law &  
Policy Center*

/s/Robert Dove  
Robert Dove (0092019)  
Kegler Brown Hill + Ritter Co., L.P.A.  
65 E State St., Ste. 1800  
Columbus, OH 43215-4295  
Office: (614) 462-5443  
Fax: (614) 464-2634  
[rdove@keglerbrown.com](mailto:rdove@keglerbrown.com)

*Attorney for the Natural Resources Defense  
Council*

/s/ Miranda Leppla  
Miranda Leppla  
Ohio Environmental Council  
1145 Chesapeake Avenue, Suite I  
Columbus, Ohio 43212-3449  
(614) 487-7506 - Telephone  
(614) 487-7510 - Fax  
[mleppla@theOEC.org](mailto:mleppla@theOEC.org)

*Counsel for the Ohio Environmental  
Council and Environmental Defense Fund*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Comments submitted on behalf of the Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Ohio Environmental Council was served by electronic mail, upon all Parties of Record on December 4, 2018.

/s Madeline Fleisher  
Madeline Fleisher

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Summary: Comments Comments on Distribution Planning Current Status Reports by the Environmental Law & Policy Center, Environmental Defense Fund, Natural Resources Defense Council, and Ohio Environmental Council electronically filed by Madeline Fleisher on behalf of Environmental Law & Policy Center and Natural Resources Defense Council and Ohio Environmental Council and Environmental Defense Fund electronically filed by Madeline Fleisher on behalf of Environmental Law & Policy Center and Natural Resources Defense Council and Ohio Environmental Council and Environmental Defense Fund