

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>IN THE MATTER OF THE COMMISSION'S</b>	)	<b>CASE No. 18-884-EL-ORD</b>
<b>ADM.CODE CHAPTER 4901:1-22</b>	)	
<b>REGARDING INTERCONNECTION SERVICES</b>	)	

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**INITIAL COMMENTS OF AEP ONSITE PARTNERS, LLC**

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**INTRODUCTION**

By Entry dated January 29, 2020, the Public Utilities Commission of Ohio (“Commission”) proposed amendments to Ohio Administrative Code Chapters 4901:1-22 regarding electric interconnection services. AEP OnSite Partners, LLC (“AEP-OSP” or the “Company”) appreciates the opportunity to comment on the proposed rules. AEP-OSP applauds the Commission’s proposed revisions to OAC §4901:1-22 to utilize the term of “distributed energy resource” (DER) to encompass both generators and energy storage technology. In addition, AEP-OSP supports the Commission’s efforts to parallel the interconnection requirements with changes in the industry and applicable industry standards. AEP-OSP’s comments generally focus on proposed changes that will further streamline the interconnection process and marginally enhance the clarity of the proposed provisions.

**AEP-OSP COMMENTS On Staff Questions**

AEP-OSP has only a few observations to share with respect to Staff’s questions regarding the interconnection rule review, identified by the alphabetical reference in the Commission’s Entry:

(c) **PJM also encouraged the Commission to use this rule review proceeding to provide clarity regarding whether a request for interconnection is subject to Ohio or PJM jurisdiction. Is such clarification necessary at this time?**

The timing limitations in the current PJM interconnection process, consisting of only two (2) study periods per calendar year, presents a high probability of adversely impacting the State of Ohio's renewable generation interconnection implementation. Ohio's proposed interconnection rules are not so limited in the timing of study periods in a calendar year. Consequently, AEP-OSP strongly supports the more flexible approach utilized by the State of Ohio in its exercise of jurisdiction over the interconnection process.

**(d) With respect to Ohio Adm.Code 4901:1-22-03, are there any additional standards and codes that have become relevant to the interconnection and interoperability of DERs?**

AEP-OSP is not currently aware of any additional standards or codes that should be considered for relevancy to the interconnection and interoperability beyond those already identified and considered by the Staff and Commission.

**(h) Finally, given that the rules are technically nuanced, should the Commission form a working group including various stakeholders to aid in the continued development of these rules, both now and through future review?**

AEP-OSP agrees that the interconnection process is technically nuanced, that new and evolving approaches to distributed generation resources necessitates a dynamic review process and supports a stakeholder process to continue the development and review of these requirements. AEP-OSP looks forward to participating should the Commission adopted such a working group approach.

#### **AEP-OSP Proposed Comments On Specific Rules:**

AEP-OSP appreciates this opportunity to comment on a few of the specific rules and suggests the following revisions for the reasons indicated.

**1) 4901:1-22-04(C)(2), General Provisions**

AEP-OSP would suggest the following redraft to avoid semantics over whether a proposed modification is “minor” while addressing the implications of significant changes being made to a pending interconnection application:

Where ~~minor~~ modifications to a pending application are required during the EDU’s review of the application, such ~~minor~~ modifications shall not require a new or separate application to be filed by the applicant. Modifications not qualified as minor modifications may require additional studies at the cost of the applicant.

**2) 4901:1-22-06(B)(1)(d), Level 1 Review Procedure**

AEP-OSP recommends deleting the phrase “inverter based equipment package” from this rule as this phrase unnecessarily limits the distributed electricity resource technologies able to qualify for a level 1 application process. It seems likely that now or in the future other DER technologies could and should qualify for a level 1 application process.

**3) 4901:1-22-07(B)(1), Level 2 Review Procedure**

AEP-OSP suggests striking the last sentence of subpart (d), “The application of this screen addresses back feed and islanding conditions.” This sentence is not necessary as this provision does not contemplate any “back feed” or “islanding” conditions.

In subpart (k) the phrase “inverter based equipment” unnecessarily limits DER technologies that are able to qualify for level 2, and therefore we would suggest deleting its reference.

## **CONCLUSION**

AEP-OSP appreciates the opportunity to provide comments and suggestions on these sections of the Ohio Administrative Code, as well as the Commission’s intention to improve process efficiencies and streamline procedures for interconnection services. AEP-OSP respectfully requests that its suggestions above be considered for incorporation into the final

rules adopted as a result of this proceeding.

Respectfully submitted,

/s/ F. Mitchell Dutton

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Summary: Comments - Initial Comments of AEP Onsite Partners LLC electronically filed by  
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