

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for Certification)	
As an Ohio Renewable Energy Resource Generation)	Case No. 21-0064-EL-REN
Facility for the David Cullison Residence)	

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

CASE HISTORY

On December 31, 2020, a representative submitted an application on behalf of David Cullison (Applicant) for certification of the solar photovoltaic (SPV) facility at the David Cullison residence (Facility).¹

The Facility is located in Newburgh, Indiana. Comprised of twenty-eight solar panels, the aggregate capacity of the Facility is 9.10 kilowatts (kw). According to the application, the Facility was placed into service in May 2019.

An Attorney Examiner Entry issued on January 22, 2021, suspended the automatic approval process for this case.

Staff sent the Applicant's representative a number of questions related to the application on January 28, 2021. The representative provided Staff with responses on February 5, 2021, with those responses later filed in this proceeding on February 22, 2021.

STAFF REVIEW

The Staff's consideration of applications for certification of a renewable energy resource facility consists primarily, but not exclusively, of three statutory criteria: (1) the deliverability of the

¹ The Applicant's representative submitted its application on December 31st, and Staff initiated a case to consider the application on the Commission's Docketing Information System on January 21, 2021.

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

Under R.C. 4928.64(B)(3), a qualifying renewable energy resource must either have a facility located in Ohio, or be deliverable into Ohio. Further, Ohio Administrative Code (Ohio Adm.Code) 4901:1-40-01(F) defines "deliverable into this state" as follows:

"Deliverable into this state" means that the electricity or qualifying biologically derived methane gas 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 is physically deliverable to the state.

Because the Facility is a grid-connected facility located in Indiana, a state contiguous to Ohio, Staff concludes that the Facility is deliverable to Ohio.

2) Resource/Technology

The R.C. defines "renewable energy resource" for purposes of the state's renewable portfolio standard (RPS).² This statutory definition of a renewable energy resource includes SPV, and therefore Staff concludes that the Facility satisfies the resource/technology provision of the statute.

3) Placed In-Service Date

The Facility must satisfy one of the applicable statutory provisions pertaining to the placed in-service date.³ With the Facility having a placed in-service after January 1, 1998, Staff finds that the Facility satisfies the applicable placed in-service date requirement.

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.⁴ As the Facility is above 6 kw, this particular rule is applicable. The application indicates that the Facility's output will be measured by a revenue grade meter, therefore it satisfies this rule requirement.

² R.C. 4928.01(A)(37)

³ R.C. 4928.64(A)(1)

⁴ Ohio Adm.Code 4901:1-40-04(C)(2)(e).

- (b) The Facility must be registered with either M-RETS or PJM EIS' GATS, the two attribute tracking systems currently recognized by the Commission. The application indicated that the Facility will be registered with GATS.
- (c) Information provided as part of the completed application indicated that the Facility includes a battery storage component. While the presence of a battery doesn't necessarily impact a facility's potential for certification, it does present an additional consideration related to the reporting of that facility's output.

Depending on how a SPV plus storage system is configured, it is possible for the battery to be charged by the solar panels and/or the electric grid. That would be problematic if the grid power is characterized as renewable and reported to the applicable attribute tracking system (i.e., GATS). Staff does not wish to discourage the use of battery storage components or other technological innovations for which there is customer demand. However, it is critical to maintain the integrity of the renewable portfolio standard compliance instruments, such that a renewable energy credit (REC) equals a megawatt-hour of generation from a renewable energy resource – and that generic electricity from the grid not be reported to the tracking system as renewable.

At this point, Staff is not proposing a specific configuration that must be instituted for SPV plus storage systems. Rather, for such facilities that seek Ohio certification for the solar component, Staff stresses the importance of measuring and reporting the solar output exclusively. Future applications involving SPV plus storage will be reviewed with this objective in mind.

For the Facility, responses to Staff's questions indicate that the battery has been programmed only to be charged by the solar panels. Therefore, as currently programmed, this battery is not being charged by the electric grid. The responses further assert that the SolarEdge metering platform measures exclusively the solar output, rather than battery output, and that the Applicant's representative (SRECTrade) would only be reporting output from the solar panels to GATS.

STAFF RECOMMENDATION

Staff has completed its review of the application and any supplemental information provided by the Applicant. Staff has determined that the Facility appears to satisfy the Commission's requirements for certification as a renewable energy facility. Staff recommends that the Facility be certified.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/3/2021 11:20:21 AM

in

Case No(s). 21-0064-EL-REN

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