

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for Certification                    )  
As an Ohio Renewable Energy Resource Generation                )        Case No. 21-0516-EL-REN  
Facility for the Moraine Wind LLC Facility                            )

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

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**CASE HISTORY**

On April 23, 2021, Moraine Wind, LLC (Applicant) applied for certification of the Moraine Wind, LLC facility (Facility).<sup>1</sup> The Applicant also provided Staff with a Distribution Factor Analysis (DFAX) performed by PJM in May 2021.

The Facility is located in Woodstock, Minnesota. Comprised of 34 wind turbines, the aggregate capacity of the Facility was listed as 51 megawatts. According to the application, the Facility was placed into service in November 2003.

An Attorney Examiner Entry issued on May 5, 2021, suspended the automatic approval process for this case.

Both Carbon Solutions Group, LLC and Blue Delta Energy, LLC have filed Motions to Intervene in this proceeding.

**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 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.

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<sup>1</sup> The Applicant submitted its application on April 23, 2021, and Staff initiated a case to consider the application on the Commission’s Docketing Information System on April 30, 2021.

## 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 Minnesota, a state not contiguous to Ohio, Staff concludes that the Applicant would need to provide sufficient documentation to demonstrate physical deliverability to Ohio consistent with the approach first established in Case No. 09-0555-EL-REN. In 09-0555-EL-REN, the Commission accepted the Staff’s proposed approach requiring that the absolute value of a facility’s impact on a transmission line in Ohio must be greater than 5 percent and greater than 1 megawatt (MW), as determined by an adequate power flow study.

The Applicant provided a DFAX power flow study which was performed by PJM Interconnection, LLC. The DFAX analysis assumed a 50/50 peak load forecast for the 2025 Regional Transmission Expansion Plan Base Case. The DFAX study evaluated the impacts of power flows from the Facility’s injection of energy on approximately 3,000 electric system transmission facilities in Ohio and the surrounding areas.

The highest DFAX value (**16.37%**) within Ohio occurred on American Electric Power’s Marysville (OH) – Sorenson (IN) 765 kilovolt transmission line.<sup>2</sup> The value meets the greater than five percent transmission line impact criterion.

Multiplying the highest DFAX value by the Facility’s nameplate capacity results in a value of **8.35 MWs**, which satisfies the greater than 1 MW criterion.<sup>3</sup>

As the Facility satisfies both the 5 percent and 1 MW criteria, Staff concludes that the Facility is physically deliverable to the state of Ohio.

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<sup>2</sup> The highest DFAX value for a line exclusively (starting and ending) in Ohio was 11.16% for the Vassel (OH) – AB2-067 Tap (OH). If this line was selected rather than the line referenced in the text above, it would not change Staff’s conclusion and recommendation for the Facility.

<sup>3</sup>  $0.1637 * 51 = 8.3487$  MW

2) Resource/Technology

The R.C. defines “renewable energy resource” for purposes of the state’s renewable portfolio standard (RPS).<sup>4</sup> This statutory definition of a renewable energy resource includes wind, 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.<sup>5</sup> With the Facility having been 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 kilowatts measure their renewable output with a utility-grade meter.<sup>6</sup> The meter 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. The application indicates that the Facility is registered on M-RETS, a fact confirmed by Staff.<sup>7</sup>

## **STAFF RECOMMENDATION**

Staff has completed its review of the application and any supplemental information provided by the Applicant. Staff has determined that the Facility satisfies the Commission’s requirements for certification as a renewable energy facility. Therefore, Staff recommends that the Facility’s application be approved.

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<sup>4</sup> R.C. 4928.01(A)(37)

<sup>5</sup> R.C. 4928.64(A)(1)

<sup>6</sup> Ohio Adm.Code 4901:1-40-04(C)(2)(e).

<sup>7</sup> The Facility has an M-RETS ID of M392.

**This foregoing document was electronically filed with the Public Utilities**

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