

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application for Certification)	
As an Ohio Renewable Energy Resource Generation)	Case No. 21-0742-EL-REN
Facility for the Winnebago Wind Farm Facility)	

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

CASE HISTORY

On June 18, 2021, Iberdola Renewables (Applicant) applied for certification of the Winnebago Wind Farm facility (Facility).¹ The Applicant also provided Staff with a Distribution Factor Analysis (DFAX) performed by PJM in February 2021.

The Facility is located in Kensett, IA. Comprised of 10 wind turbines, the aggregate capacity of the Facility is listed as 20 megawatts. According to the application, the Facility was placed into service in September 2008.

An Attorney Examiner Entry issued on June 30, 2021, suspended the automatic approval process for this case.

A Motion to Intervene in this proceeding was filed by Carbon Solutions Group, LLC.

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.

¹ The Applicant submitted the application on June 18, 2021, and Staff initiated a case to consider the application on the Commission's Docketing Information System on June 21, 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 Iowa, 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 more than 3,000 electric system transmission facilities in Ohio and the surrounding areas.

The highest DFAX value (**16.8%**) within Ohio occurred on American Electric Power’s (AEP) Marysville (OH) – Sorenson (IN) 765 kV transmission line.² 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 **3.36 MWs**, which satisfies the greater than 1 MW criterion.³

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.

² The highest DFAX value for a line exclusively (starting and ending) in Ohio is 11.3% for AEP’s Vassel (OH) – AB2-067 Tap (OH) 765 kV transmission line. 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.

³ $0.168 * 20 = 3.36$ MW

2) Resource/Technology

The R.C. defines “renewable energy resource” for purposes of the state’s renewable portfolio standard (RPS).⁴ 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.⁵ 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.⁶ 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.

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.

⁴ R.C. 4928.01(A)(37)

⁵ R.C. 4928.64(A)(1)

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

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Summary: Staff Review and Recommendation electronically filed by Kristin Clingan on behalf of Staff