

**BEFORE  
THE OHIO POWER SITING BOARD**

**IN THE MATTER OF THE OHIO  
POWER SITING BOARD’S REPORT  
TO THE GENERAL ASSEMBLY  
REGARDING THE POWER  
TRANSMISSION SYSTEM.**

:  
: **Case No. 21-796-EL-UNC**  
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**INITIAL COMMENTS  
SUBMITTED ON BEHALF OF ONE ENERGY ENTERPRISES LLC**

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**I. INTRODUCTION**

One Energy Enterprises LLC (“One Energy”), based in Findlay, Ohio, has installed 40.5 megawatts (“MW”) of operating, behind-the-meter wind projects for industrial and manufacturing companies in Ohio. One Energy’s projects range from 1.5 MWs to 4.5 MWs and its customers include Cooper Farms, Haviland Plastics, Whirlpool Corporation, Ball Corporation, and Marathon Petroleum. By entry dated September 24, 2021, the attorney examiner in this case found that interested parties must file initial comments regarding the Ohio Power Siting Board’s Staff Report (“Board”) regarding whether the current requirements for the planning of power transmission systems and associated facilities investment in Ohio are cost effective and in the interest of consumers by October 8, 2021. After reviewing the Staff’s Report, One Energy submits its brief initial comments below.

**II. INITIAL COMMENTS**

One Energy and its customers may be affected by the Board’s determination in this matter and has substantial interest in this proceeding. One Energy continues to be involved in efforts at the Public Utilities Commission of Ohio (“Commission”) and at the Board through its work with all of Ohio’s electric distribution utilities, to promote fair and non-discriminatory practices and

policies for behind-the-meter projects in Ohio, while protecting the safety and reliability of the grid. One Energy is deeply interested in ensuring that the ultimate resolution of this matter does not have a negative impact on industrial and manufacturing customers with behind-the-meter generation, or those installing behind-the-meter generation in Ohio, and spurs investment in distributed generation resources.

At this time, One Energy is concerned that the Board's potential expansion of its jurisdiction to include power transmission systems down to 69 kV. Such a change may lead to higher costs for consumers due to additional administrative and ancillary costs when it is unclear how the change would be in the interest of consumers. As a result, One Energy respectfully asks the Board to clarify that any potential expansion of its jurisdiction or change in rules does not affect or apply to behind the meter distributed generation. One Energy looks forward to participating in the public hearing and being involved in the overall process moving forward.

**Respectfully submitted,**

*/s/ James D. Dunn*

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## CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document also is being served via electronic mail on October 8, 2021 upon the parties listed below.

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Summary: Comments Initial Comments electronically filed by Mr. James Dunn on behalf of One Energy Enterprises LLC