

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of The Application of Moraine)
Wind LLC for Certification as an Eligible) Case No. 21-516-EL-REN
Ohio Renewable Energy Resource)
Generating Facility.)
)

In the Matter of The Application of Rugby)
Wind LLC for Certification as an Eligible) Case No. 21-517-EL-REN
Ohio Renewable Energy Resource)
Generating Facility.)
)

In the Matter of The Application of Elm)
Creek II for Certification as an Eligible) Case No. 21-531-EL-REN
Ohio Renewable Energy Resource)
Generating Facility.)
)

In the Matter of The Application of Buffalo)
Ridge II for Certification as an Eligible) Case No. 21-532-EL-REN
Ohio Renewable Energy Resource)
Generating Facility.)
)

In the Matter of The Application of Barton)
Windpower 1 for Certification as an) Case No. 21-544-EL-REN
Eligible Ohio Renewable Energy Resource)
Generating Facility.)
)

In the Matter of The Application of Barton) Case No. 22-380-EL-REN
Windpower, LLC for Certification as an)
Eligible Ohio Renewable Energy Resource)
Generating Facility.)

**PREFILED TESTIMONY
OF
Jason A. Cross
ON BEHALF OF THE STAFF OF THE
PUBLIC UTILITIES COMMISSION OF OHIO,
POWER SITING DEPARTMENT**

STAFF EX. ____

August 26, 2022

1 1. Q. Please state your name and business address.

2 A. My name is Jason Cross, and my business address is 180 East Broad Street,
3 Columbus, OH 43215.

4

5 2. Q. By whom are you employed and what is your position?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO or
7 Commission) as a Utility Specialist 3 in the Power Siting Department.

8

9 3. Q. Please summarize your educational background and work experience.

10 A. I received an Associate of Science degree in Electronics Technology from
11 ITT Technical Institute in 1993 and a Bachelor of Science degree in
12 Electronics Engineering Technology from DeVry University in 1998.
13 I have been employed by the PUCO since 2001 in the Energy and
14 Environment Department, the Rates and Analysis Department, the
15 Information Technology Department, and the Power Siting Department.
16 While employed in the Power Siting Department, my responsibilities at the
17 PUCO have primarily involved engineering, including, but not limited to,
18 grid interconnection, Ohio's portion of the bulk electric system, and
19 regional transmission organizations. I have been the PUCO Staff (Staff)
20 expert on grid interconnection related items in hundreds of staff reports.

1 4. Q. Have you testified in prior proceedings before the Commission?

2 A. Yes. I have testified in prior proceedings before the Commission on behalf
3 of Staff.

4
5 5. Q. What is the purpose of your testimony in this proceeding?

6 A. To support Staff's conclusion that the analysis performed followed the
7 Commission approved deliverability standard established by the
8 Commission in 2011 in Case No. 09-0555-EL-REN, known as the Koda
9 decision.¹

10

11 6. Q. Please explain how staff performs its analysis that a facility meets the
12 deliverability standard (significant impact) established by the Commission?

13 A. The methodology recommended by staff for a noncontiguous state, and
14 approved by the Commission, is that the absolute value of the impact on a
15 transmission line in Ohio must be greater than 5 percent (%) and greater
16 than 1 megawatt (MW), as determined by an adequate power flow study.

17

18 7. Q. Please explain the process staff uses to complete its deliverability analysis.

19 A. The applicant submits to Staff a distribution factor (DFAX) analysis
20 completed by PJM Interconnection, LLC. The DFAX analysis displays the

¹ Case No. 09-0555-EL-REN.

1 percentage of impact the facility would have on transmission lines on the
2 electric grid. DFAX values from transmission lines where at least one
3 segment is located within Ohio are reviewed based on the highest absolute
4 percentage.

- 5 1. If no DFAX values on Ohio transmission lines are greater than 5%,
6 the facility is considered not deliverable into Ohio.
- 7 2. If DFAX values greater than 5% exist on transmission lines in Ohio,
8 then the first criterion has been met.

9 a. To check if the second criterion is met, the following criteria
10 is applied.

- 11 i. Multiply the DFAX value by the applicant's facility's
12 nameplate capacity (DFAX percentage * Facility
13 Capacity = Capacity).²

14 b. If the Capacity is greater than 1 MW the facility meets the
15 second criterion and is deliverable into Ohio.

16 8. Q. Did the facilities applying for certificates in these cases meet the
17 Commission approved deliverability standard?

18 A. Yes.

² A 100 MW facility with a DFAX value of 6% means modeling indicates that 6 MW is deliverable to a sink point in Ohio, meeting the first criterion. Multiplying the DFAX value by the facility's nameplate capacity (0.06 * 100 = 6 MW) is greater than 1 MW, meeting the second criterion.

1 9. Q. Does this conclude your testimony?

2 A. Yes, it does. However, I reserve the right to submit supplemental
3 testimony, as new information subsequently becomes available or in
4 response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Prefiled Testimony of Jason A. Cross** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the following Parties of Record, this 26th day of August 2022.

/s/ Thomas Lindgren

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REN, 21-0544-EL-REN, 22-0380-EL-REN**

Summary: Testimony Prefiled Testimony of Jason A. Cross on Behalf of the Staff for
of the Public Utilities Commission of Ohio, Power Siting Department electronically
filed by Mrs. Kimberly M. Naeder on behalf of PUCO