

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission’s Review of)
Chapter 4901:1-22 of the Ohio Administrative) Case No. 22-861-EL-ORD
Code Regarding Interconnection Standards)
)

COMMENTS OF DUKE ENERGY OHIO, INC.

Comes now Duke Energy Ohio, Inc., (Duke Energy Ohio or the Company) and respectfully submits its comments regarding administrative rules in O.A.C. Chapter 4901:1-22 (Chapter 22), addressing interconnection standards. The Public Utilities Commission of Ohio (Commission) issued an entry on May 17, 2023, proposing substantive changes to reduce the total number of regulatory restrictions present as well as non-substantive changes to provide clarity and correct typographical errors.¹ Pursuant to the Commission entry, initial comments were to be filed no later than June 2, 2023.²

I. COMMENTS

The Company comments only to identify what it believes to be two minor errors, one clerical and one grammatical.

First, the current version of O.A.C. 4901:1-22-01(A)(3) refers to “a distributed energy resource as defined in paragraph (K) of this rule.”³ The Company believes that this should be

¹ Entry, p. 2 (May 17, 2023).

² *Id.*, pp. 1,3

³ Entry, Attachment A, p. 1 (May 17, 2023).

corrected to refer to “paragraph (L),” which contains the definition of a distributed energy resource. Paragraph (K) defines “cost recovery.”

Second, the definition of “minor modification” in O.A.C. 4901:1-22-01(U) appears to be missing words or to contain incorrect words in the underlined portion below:

“Minor modification” to an interconnection application means changes to the EDU’s electric system, or adversely impact earlier queued interconnection requests, and that would otherwise not be done but for the applicant’s interconnection request.⁴

The Company understands that the purpose of this proceeding is primarily to reduce the total number of regulatory restrictions and not to conduct a comprehensive substantive review of the rules. The Company reserves all its rights to make substantive suggestions for rule revisions in the appropriate future proceeding.

II. CONCLUSION

The Company appreciates the opportunity to submit comments in this proceeding.

⁴ *Id.*, p. 2.

Respectfully submitted,

DUKE ENERGY OHIO, INC.

/s/ Larisa M. Vaysman

Rocco D'Ascenzo (0077651)

Deputy General Counsel

Jeanne W. Kingery (0012172)

Associate General Counsel

Larisa M. Vaysman (0090290) (Counsel of Record)

Senior Counsel

Elyse H. Akhbari (0090701)

Senior Counsel

Duke Energy Business Services, LLC

139 East Fourth Street, 1303-Main

Cincinnati, Ohio 45202

(614) 222-1331 (telephone)

(614) 222-1337 (facsimile)

Rocco.D'Ascenzo@duke-energy.com

Jeanne.Kingery@duke-energy.com

Larisa.Vaysman@duke-energy.com

Elyse.Akhbari@duke-energy.com

Willing to accept service electronically

Attorneys for Duke Energy Ohio, Inc.

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 is also being served via electronic mail on the 2nd day of June, 2023, upon the persons listed below.

/s/ Larisa M. Vaysman

Larisa M. Vaysman

John H. Jones
Section Chief
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215
Telephone: 614-466-4397
Facsimile: 614-644-8764
John.Jones@ohioattorneygeneral.gov

Attorney for Staff of the Public Utilities Commission of Ohio

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

6/2/2023 1:59:34 PM

in

Case No(s). 22-0861-EL-ORD

Summary: Comments Comments of Duke Energy Ohio, Inc. electronically filed by Mrs. Tammy M. Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Vaysman, Larisa and Akhbari, Elyse Hanson and Kingery, Jeanne.