



Ohio kicks off interconnection rulemaking: Implications for distributed generation

September 25, 2018

As part of the state process requiring that all state agencies conduct a review of their rules every five years, the Public Utilities Commission of Ohio (PUCO) recently opened a docket to review Ohio Adm. Code Chapter 4901:1-22, which contains the rules for interconnecting distributed generation to the electric distribution system. Currently, the standards provide for three levels of review for the interconnection of DG systems of up to 20 megawatts.

On September 11, 2018, the PUCO held a stakeholder workshop to solicit feedback on potential revisions to the rules.

The PUCO's review of the interconnection rules comes shortly after the Institute of Electrical and Electronics Engineers (IEEE) released updates and revisions to the IEEE 1547 standard regarding the requirements for interconnecting distributed energy resources (DERs) with the electric distribution system. It also comes shortly after the PUCO's release of "PowerForward: A Roadmap to Ohio's Electricity Future," which sets forth certain policy positions and outlines principles and objectives for Ohio's grid modernization efforts.

The integration of DERs into the grid is a consistent theme throughout the PowerForward Roadmap. The report notes that "state policy encourages the implementation of DG through review and update of rules surrounding essential issues associated with the deployment of DG, including: interconnection standards, standby charges, and net metering. The regular review of these rules (and enabling statute) should ensure that new opportunities (e.g. community solar) are considered" (emphasis added). It is unclear to what extent these PowerForward themes and principles will be present in this rulemaking.

At the workshop, PJM Interconnection emphasized the importance, and its support of, DER “Ride-Through” requirements. Ride-Through is the capability of a generator to remain connected during abnormal conditions. According to PJM, as small generators have proliferated, Ride-Through requirements have become essential. IEEE Standard 1547-2003, which is now universally referenced in federal and state law regulations, lacks a Ride-Through requirement. However, IEEE 1547-2018 offers three categories of Ride-Through. Within each category, default “trip” settings are broadly available. But it will be up to the authorities having jurisdiction to specify the category and modify these trip settings (for example, in this rulemaking). PJM encouraged the PUCO to adopt IEEE Standard 1547-2018 and its Ride-Through provisions as a feature of its interconnection rules.

PJM also encouraged the PUCO to use this rulemaking to clarify that the definition of “customer generator” includes wholesale DERs. Most DERs do not currently interact with PJM’s wholesale markets or transmission system and, instead, serve customers directly. However, some DERs do sell into wholesale markets, and the majority of these DERs interconnect through the state interconnection process and not PJM’s. PJM encouraged the PUCO to clarify in its rules that most wholesale DERs will interconnect under state jurisdiction.

Two of Ohio’s electric distribution utilities also provided comments at the workshop. One utility stated that DERs present engineering design challenges, such as overloads, voltage regulation and proper coordination of overcurrent devices. The utility also emphasized that that the PUCO should resist any shift from utility control and that the utility should be allowed to impose standards greater than the national standards. Another utility recommended that all distributed generation be required to install a blank meter socket, which would allow the utilities to install internal data meters. This meter would allow greater insights on customer load on the grid, designing tariffs and identifying customer service opportunities.

A developer of distributed generation projects emphasized that the new IEEE Standard 1547-2018 will potentially have significant impact on how distributed generation interconnections take place. The developer indicated that because the new standard establishes optional standards for the PUCO to choose or reject and will allow distributed generation facilities to engage in functions that they have not previously performed in Ohio, such as low-voltage Ride-Through and zero voltage Ride-Through, the PUCO should engage in further stakeholder feedback specific to these technical issues prior to releasing the proposed rules.

After the PUCO staff considers the feedback from the workshop, the proposed amendments to the rules will be issued for comments and reply comments.

Authors



Dylan F. Borchers

Partner

Columbus
614.227.4914
dborchers@bricker.com



Devin D. Parram

Partner, Energy Practice Group Chair

Columbus
614.227. 8813
dparram@bricker.com