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**PUCO**

September 8, 2008

**Case No. 08-888-EL-ORD**

**New Chapter 4901:1-40**

**Title: Ohio Alternative Energy Resource Standard**

**Re: APX Comments to The Public Utilities Commission of Ohio**

APX Inc. thanks The Public Utilities Commission of Ohio for the opportunity to submit comments on its August 2008 draft rules for implementation of the Ohio Alternative Energy Resource Standard. We commend Governor Strickland, the Ohio legislature and the Public Utilities Commission for their leadership, and we recognize the Ohio Utilities and the many committed stakeholders in Ohio for their efforts and support in pursuing a comprehensive policy for alternative energy in the State of Ohio.

APX offers its comments based upon its extensive experience in providing the critical integrity, transparency, and credibility for renewable energy and carbon markets. APX is the leading infrastructure provider for environmental and energy markets in renewable energy and greenhouse gases including carbon commodities. The APX Environmental Market Depository™ is trusted to create, track, manage, and retire renewable energy certificates (RECs), energy efficiency and conservation certificates, carbon offset credits such as verified emissions reductions (VERs), and greenhouse gas emission allowances.

The company is the system of choice for every major US renewable energy market:

- Midwest Renewable Energy Tracking System (M-RETS)
- PJM-Generation Attributes Tracking System (GATS)
- ERCOT Renewable Energy Credit Trading System
- NEPOOL Generation Information System (GIS)
- Western Renewable Energy Generation Information System (WREGIS)

APX also provides the highest quality transaction and data infrastructure for the tracking of GHG offsets and allowances, including such state and international entities as the Voluntary Carbon Standard, The Gold Standard, and the California Climate Action Reserve.

**4901:1-40-04 Qualified Resource:** APX notes and supports the Commission's proposal to allow both bundled renewable energy and attribute supply options, as well as un-bundled renewable energy credits (REC's) as an equally acceptable means for

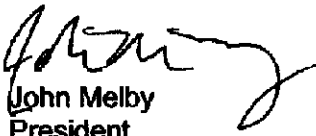
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compliance with the standard. We also note that the qualifying attributes from mercantile customer-owned resources may also be an additional supply option for compliance. Given our experience in other state RPS markets, we strongly believe that a common accounting platform for tracking the production, ownership and utilization of qualifying renewable energy is necessitated. We believe that the Ohio market would be well served to have all qualifying renewable energy accounted for and tracked in the form of REC's. This common methodology will provide the commission with an effective and efficient means for monitoring compliance, as well as providing market integrity and public transparency. Such a common platform will be critical to making sure that there is no double counting; that attributes are only being used once, and once retired they are no longer usable. It will also help safeguard against multiple claims of ownership. This model has proven effective with years of successful experience in other state RPS markets.

APX is pleased to draw on its broad experience in supporting state renewable energy programs and in developing transactional-based certificate tracking and reporting systems, and looks forward to our further participation in the development of the rules to implement the Ohio Alternative Energy Resource Standard.

Please feel free to email with any questions: [jmelby@apx.com](mailto:jmelby@apx.com) or [gguzy@apx.com](mailto:gguzy@apx.com).  
Thank you.

Sincerely,

  
John Melby  
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APX, Inc.

  
Gary S. Guzy  
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