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FAX



Sylvania United Church of Christ

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 William H. Childster, Pastor

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 PUCO

March 4, 2010

The Public Utilities Commission of Ohio

Ref: Case No. 09-1922-EL-BEC

Fax ~~614-752-8351~~
 Docketing - 614-466-0313

Dear PUCO Members:

As Moderator of the Sylvania United Church of Christ I would like to provide the PUCO with information that I believe is relevant to your consideration of Case No. 09-1922-EL-BEC filed by the companies of First Energy in their request for a force majeure determination with respect to their compliance with the Ohio 2009 solar energy resources benchmarks.

The church's 6.4 kW PV system was activated on 8/18/05 and has been producing about 7500 kWh of electricity annually ever since.

In First Energy's request in case 09-1922-EL-BEC they state: "The [First Energy] Companies have made aggressive efforts to meet the SER benchmark...." We would like to point out that First Energy, to this date, has not contacted the Sylvania UCC to inquire about purchasing solar renewable energy credits (SRECs) from us. This, in spite of the fact that our PV system has received a grant from the Ohio Department of Development and has been described in the Blade and in a number of other public venues. Here are some relevant details:

1. Sylvania UCC received a grant from the Advanced Energy Fund of the Ohio Department of Development in 2005 that covered half of the cost of the rooftop PV system. Grant awardees are publicly disclosed and are required to help increase public awareness of the benefits of solar energy. This the church has done. See below. The award to the Sylvania UCC is listed at:
<http://www.development.ohio.gov/cms/uploadedfiles/CDD/OEE/Grant%20Award%20List.pdf>
2. On August 13, 2009, Sylvania UCC was contacted by DP&L expressing interest in purchasing RECs from its solar array. We assume they obtained the church's contact information from the Ohio Department of Development. However, we have not yet received any such request from First Energy concerning RECs.
3. Information about the Sylvania UCC PV array can be found on the church's web page:
http://www.sylvaniasucc.org/gifts_creation.html.
4. The Sylvania UCC church has participated in the Ohio Solar Tour for the past four years and is a charter member of the Ohio Interfaith Power and Light. This participation has been mentioned in more than one Toledo Blade article. In addition, there are several references to the Sylvania UCC church's PV array on the Green Energy Ohio web site.
<http://www.greenenergyohio.org>

Kathy Tashima, Director of Congregational Life; Cathy Hunter RN, Director of Health Ministries; Sally Manning, Director of Music & Organist

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5. Sylvania UCC has just now begun the process with PUCO to receive certification of its PV system for SRECs. Its PUCO tracking number is 10-128-EL-REN. The church is presently awaiting installation of a utility grade meter in order to complete its certification. It intends to request a waiver of the special meter requirement for 2009 since the regulation was clarified only in the ruling of Dec. 10, 2009.

Given the lengthy process for accomplishing PUCO Certification, Generation Attribute Tracking System registration, and SREC certificate creation, we would urge the PUCO not to waive the 2009 solar benchmark but to allow First Energy to defer satisfying their 2009 SREC benchmark until the end of 2010. However, there should be no slippage in further annual benchmarks from those originally established by the PUCO.

A delay in the requirement for the 2009 benchmark would have the advantage of giving extra time for the many homeowners, businesses, and other institutions to complete this rather lengthy certification process and still receive credit for their generation units. In fact, First Energy could perform a valuable service to its customers by assisting them with this certification, registration, and SREC marketing process.

If you have any questions about my experiences, please contact me.

Thank you.



Jim Cummins, Moderator
Sylvania United Church of Christ