



Revitalizing Auto Communities
Environmental Response Trust

August 16, 2011

The Public Utilities Commission of Ohio
Docketing Division
Attn.: Mr. Todd A. Snitchler, Chairman
11th Floor
180 East Broad Street
Columbus, OH 43215

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Re: Case No. 11-430~~3~~⁴-EL-UNC; Staff Proposal for an Economic Development Tariff Template

Dear Chairman Snitchler and Commissioners:

I am writing on behalf of RACER Trust in support of adoption of the recently noticed Staff Proposal for an Economic Development Tariff Template, Case No. 11-4303-EL-UNC.

The Revitalizing Auto Communities Environmental Response Trust ("RACER"), which was created by a U.S. Bankruptcy Court to clean up and position for redevelopment 89 industrial plants and other properties in 14 states owned by the former General Motors Company before its 2009 bankruptcy, now owns the former GM Mansfield Stamping Plant property located at 2525 West Fourth Street, Ontario, Ohio.

RACER's environmental cleanup/economic development mission is to revitalize this property, as well as the other industrial properties now owned by RACER. We hope to attract new owners to these properties who can create jobs and economic opportunities to help the communities hurt by the GM bankruptcy.

To accomplish these goals, the Trust, in accordance with the provisions of the Settlement Agreement entered by the Bankruptcy Court, is marketing the Ontario property for sale. We believe that successful redevelopment of the Ontario property is most likely to happen if this property were to possess certain competitive advantages vis-à-vis other industrial properties available to potential end-users in markets across the U.S.

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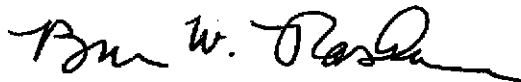
Upon review of the Staff's proposal, we believe that the economic development tariff template will be an important tool for positioning the Ontario property to compete well for numerous, energy-intensive industry clusters which also require a relatively large number of workers and will result in restoring tax density due to the associated payrolls, investment in new capital equipment, and the sales/income that will be generated if such an end-user can be attracted to the property.

In particular, we are especially supportive of the feature in the proposal that would establish a scaled approach to qualifying for the tariff, instead of a single, large energy threshold requirement being the sole test for eligibility. This flexibility will likely result in attracting some relatively smaller manufacturing operations, with future growth and expansion potential, that are new to the State of Ohio, as well as larger operations.

We wish to also mention to the Commission that it is our hope that this tariff, if approved by the Commission, will be available to multiple, separately-metered end-user tenants in the building, since it is highly unlikely that a single user can be found to occupy entirely this relatively large (2,500,000 SF) facility. It is much more likely that the site will be sold to a developer who will then renovate the facility, demise the space to create a multiple end-user facility, and lease the spaces to several different job providers.

Please contact me if you have any questions about RACER's, mission, operations or our comments on the Staff's proposal.

Sincerely,



Bruce Rasher
Redevelopment Manager

CC: The Honorable Larry Collins, Mayor, City of Ontario
Christiane Schmenk, Director, OH DOD
Sara Zeigler, Office of Public Affairs, PUCO
Elliott Laws, Administrative Trustee, RACER Trust
Mike Hill, COO & General Counsel, RACER Trust