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United States Department of Agriculture
Rural Development • Columbus, Ohio

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PUCO

May 21, 2012

Chairman Todd A. Snitchler
The Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

Re: In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan (Case Nos. 11-346-EL-SSO and 11-348-EL-SSO)

Dear Chairman Snitchler:

As the state director of the U.S. Department of Agriculture's Ohio Rural Development Agency — the economic development branch of the USDA in Ohio — I am writing to express my strong support for the Turning Point Solar (TPS) project presently before the Commission.

The USDA's Rural Utilities Service (RUS), which has provided project funding for rural electric cooperatives and investor-owned utilities for more than 75 years, is considering funding a significant portion of the TPS project if approved by the PUCO.

In fact, RUS's consideration of the project is proceeding apace. On April 27, the RUS published a "Finding of No Significant Impact" (FONSI) for the Environmental Assessment (EA) associated with the Turning Point Solar generation project. The EA evaluates environmental impact on the Noble County site associated with a potential loan or loan guarantee to Turning Point Solar LLC. Should the PUCO elect to approve TPS, the completion of this EA now allows for prompt consideration of a potential financing package. A announcement of the FONSI is published in the April 27 Federal Register and can be viewed online at <http://www.rurdev.usda.gov/UWP-ea.htm>

As you know, the principal mission of Ohio Rural Development is to assist in building a sustainable infrastructure for robust economic growth in small-town Ohio. Our investments in expanded broadband service, reliable water and septic systems, housing and community facilities have helped fortify small communities, making them more attractive to outside businesses and local entrepreneurs. Renewable energy projects are an important facet of this mission. By their very nature, utility-scale solar, wind and biomass projects are best located in the open areas of rural Ohio.

The rural focus of the TPS project is one of its principal attributes. The benefits of the Turning Point Solar project primarily will be enjoyed by rural and small-town residents in economically-challenged parts of Appalachian and northwestern Ohio. TPS plans to

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construct and install the 49.9 MW project in Noble County and establish a panel manufacturing factory in Napoleon (Henry County). In fact, the developers of the TPS project believe that close to 85 percent of the goods and services required for the construction of the project will be sourced in Ohio.

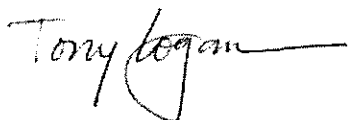
We believe that the Appalachian region of Ohio is best served by a balanced energy generation strategy. While shale gas production will bring substantial job and wealth creation to the Appalachian Ohio region in the short run, the area is uniquely poised to benefit in the long term from advanced energy technologies including hydropower, biomass, waste heat recovery, clean coal, and solar. The TPS array will provide the foundation for a balanced approach to energy generation in Southeastern Ohio.

Southeastern Ohio possesses an abundance of reclaimed strip mined lands – more than 200,000 acres according to ODNR records. This land is largely unsuitable for residential, commercial, or row crop agricultural use. The TPS development group and AEP deserve praise for turning this perceived liability into a great asset by committing 700 acres of reclaimed land for use as a solar array platform. Indeed, large stretches of Appalachian Ohio might now be viewed as prime sites for utility-scale renewable energy projects. The fact that these lands are crisscrossed by transmission lines – lines that were needed in a previous era to bring electricity to the giant shovels – is an attribute that should not be lost to Ohio's electrical systems planners.

In conclusion, USDA enthusiastically supports the Turning Point Solar project, as both a necessary addition to Ohio's electric generation portfolio and as a driver for rural economic development for this and future generations. If approved by the PUCO, we look forward to collaborating with our Ohio partners to move this project off the drawing board and into 21st century reality.

Please docket this letter in PUCO Case Nos. 11-346-EL-SSO and 11-348-EL-SSO.

Sincerely,



J. Anthony Logan, State Director
USDA Ohio Rural Development

-2-

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Ohio Environmental Council

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[UNLEASHING THE POWER OF GREEN]

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Thanks to its strategic location, skilled workforce, abundant natural resources and innovative spirit, Ohio has long been the backbone of America's economy. Though the state was among the hardest hit by the national recession, it's now fueling America's recovery. As the clouds lift from the recession, a promising bright spot has emerged, driving investment and job creation, and reestablishing Ohio as a global manufacturing powerhouse. This bright spot is clean energy. While the success of clean energy in Ohio has been remarkable, it pales in comparison to its potential. And no project in the state demonstrates that potential better than the Turning Point Solar Project.

Turning Point is an important reminder of the troubling legacy of energy in Ohio and a demonstration of its promising future. Set to put some 700 acres of reclaimed strip mine land back to work, Turning Point will maximize the potential of these damaged lands. For generations, Appalachia and its people have provided the power that ran our economy, and the Turning Point project will continue this tradition for generations to come - without the negative environmental implications. Turning Point will also take advantage of an overlooked but important remnant of the region's former coal mining infrastructure - transmission lines that once powered the giant shovels used in the strip mining process. This infrastructure, coupled with seemingly endless swaths of marginal land makes the region prime real estate for future solar deployment.

In addition to these geographic assets and environmental benefits, Turning Point holds tremendous economic potential in both Southeast Ohio, and the state at large. The construction of the project itself is set to bring over 100 much-needed construction jobs during each of its three phases. Importantly, these jobs will be filled by Ohioans. Perhaps even more importantly though, the project is being leveraged to expand Ohio's already robust solar supply chain. Isofoton, a Spanish solar manufacturing company, agreed to locate its manufacturing plant in Napoleon after the Turning Point developers committed to purchase 250,000 solar panels from the company. The addition of the Isofoton plant will result in 300 permanent jobs and establish Northwest Ohio as a global leader in solar manufacturing.

It's rare that a single project hold so many positive implications for the environment and economy of an entire region, but that is the true promise of Turning Point.

Please docket this letter in PUCO Case Nos. 11-346-EL-SSO and 11-348-EL-SSO.

Brian Kaiser
Director of Green Jobs & Innovation
Ohio Environmental Council