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October 19, 2012

Todd Snitchler, Chairman **Public Utilities Commission of Ohio** 180 East Broad Street Columbus, Ohio 43215-3793

Case Number: 10-501-EL-FOR

Dear Chairman Snitchler and Commissioners,

We are writing today, as representatives of key economic development organizations in Eastern and Southeastern Ohio, to express support for the 49.9 MW Turning Point Solar Project currently being considered in American Electric Power's long-term forecast ("Need") case. We believe that in addition to considering AEP's compliance with the solar requirements of Ohio's Renewable Portfolio Standard, the Commission also has the authority and responsibility to consider the overall statewide need for a project such as TPS, as well as the significant environmental and economic impacts of the project.

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As you are well aware, our region (Appalachian Ohio) has historically lagged behind the rest of the State with in terms of jobs, wages and investment. Further, the significant investment that we have historically seen, has typically been tied to "extractive" industries that leave little behind. We believe that the Commission has the clear direction (Ohio Revised Code) and opportunity to help reverse that trend by helping to ensure "preservation of environmental quality", "conservation of energy and material resources" and "maintenance of a sound economy."

Turning Point Solar, once fully constructed, will displace approximately 70,000 tons of CO2 annually, and will displace thousands of tons of NOX, SO2, mercury and other environmentally harmful emissions every single year. It will be constructed on 700 acres of reclaimed mine land with limited value in terms of agriculture or related uses. And, with maximum output corresponding to peak-load demands, TPS will help delay the need for the construction of additional fossil fueled base-load generation, further contributing to a better environment and conservation of natural resources.

The Turning Point Solar Project has also catalyzed the collaboration of universities and private industry in both Northwest Ohio and Southeastern Appalachian Ohio. The project will create more than 300 jobs in SE Ohio, and has inspired the location of a Spanish photovoltaic manufacturer to locate its North American Headquarters in NW Ohio, with a promise to deliver another 330 good paying jobs. The economic impacts of these projects have a dramatic spillover effect. Ohio currently has approximately 150 companies in the Ohio Solar Supply Chain. TPS will source more than 85% of its components from Ohio companies. This not only provides economic promise for existing companies, but also provides

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opportunities for universities like Zane State that are training engineers, technicians and installers for private sector jobs in Ohio, and throughout the Midwest.

The State of Ohio, and our Region in particular, has a tremendous need for the TPS project. Based on the realities of the solar renewable energy credit marketplace, there appears to be a need for in-state solar RECs. Both AEP and PUCO Staff have pointed out that TPS is the only commercial-size project identified as ready to be constructed "in-state", and the totality of available out-of-state SRECs does not seem adequate to satisfy Ohio's short-term requirements. Ongoing compliance with the state solar benchmarks, through TPS and beyond, will provide tremendous growth opportunities and effective job creation, much of it in areas of the State in greatest need of economic growth.

In conclusion, we urge the Commission to issue an order in *Case Number: 10-501-EL-FOR* that establishes the need for the Turning Point Solar Project. The Commission has the authority and responsibility under the Ohio Revised Code to make this determination, which will lead to the continued development of an industry that will improve Ohio's environment while creating jobs and investment in some of the most economically distressed regions of our State.

Sincerely,

Misty Casto

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