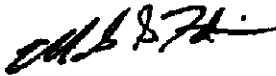


In addition, these features complement and support wind and solar power systems which require back-up power 70% of the time when the wind isn't blowing and sun isn't shining. If this back-up were provided by coal-fired power generation, the combination with PV and solar would produce more emissions and have a higher carbon footprint than fuel cells operating continuously, 24/7, at 60% electrical efficiency located close to the point of use.

RRFCS has made a strong commitment to the state of Ohio through the location of our headquarters in Canton. Our partnership with AEP is another example of the company's commitment to the future of the state – economically and environmentally. However, the recent development of the Proposed Staff Rule disqualifying a fuel cell from the Alternative Energy Portfolio Standard, if the feedstock is not renewable, is very problematic for this company's future in Ohio and our industry.

We respectfully request the PUCO commissioners to closely examine this Proposed Staff Rule and change it to reflect the language and intent found in SB221.

Best regards,



Mark S. Fleiner
President