

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Adoption of Rules for)	
Alternative and Renewable Energy)	
Technologies and Resources, and Emission)	
Control Reporting Requirements, and)	
Amendment of Chapters 4901:5.1, 4901:5-3)	Case No. 08-888-EL-ORD
4901:5-5, and 4901:5-7 of the Ohio)	
Administrative Code, pursuant to Chapter)	
4928, Revised Code, to Implement Senate)	
Bill No. 221.)	

SUPPLEMENTAL AUTHORITY SUBMITTED BY
GREAT LAKES ENERGY DEVELOPMENT TASK FORCE
CUYAHOGA COUNTY, OHIO

On behalf of the Board of Commissioners of Cuyahoga County, Ohio, the Great Lakes Energy Development Task Force ("GLEDTF") submits this additional authority to the Public Utilities Commission of Ohio ("Commission") in the above-named proceeding. As stated in its Initial Comments, GLEDTF is participating in this proceeding for a focused purpose and involves the deployment of wind turbines in Lake Erie as a pilot project, the most advantageous site in this state for powerful wind resources available and necessary for the generation of electric service from this "renewable energy resource."

As GLEDTF comments were being readied for filing, the attached article appeared on the Web at CNN.com today. The article illustrates the major reason for the urgency of GLEDTF's appeal to the Commission and the importance of the Commission's adopting the modification to the definition of "Renewable Energy Credit," appearing in Sections 4901:1-39-01(F) and 4901:1-40-01(DD), Ohio Administrative Code.

In its initial comments, GLEDTF stated:

The fact of the matter is that, if Ohio is not first [to develop its offshore wind power asset], the economic development potential of this renewable energy resource will be lost to other states. Around the country, manufacturing facilities are located at or near renewable energy projects. If real projects do not get built in Lake Erie first, the manufacturing capacity the state seeks will be built near those first projects to put a stake in the water—not Ohio.

What GLEDTF has learned in its research and that the attached article confirms is that the environment surrounding wind power development is changing rapidly, acceptance—even enthusiasm—for offshore wind power is growing, investment in research and development and ultimately deployment must begin now, and that Ohio's premier position in the offshore wind industry requires the expeditious support of Ohio regulatory, commercial and business, academic, government leadership, research and development players if Ohio is to enjoy the full benefits of its unique natural resource. The Commission has an opportunity in this proceeding to create a compelling incentive now for those who would consider investment in and use of offshore wind power.

Respectfully submitted on behalf of
GREAT LAKES ENERGY DEVELOPMENT TASK
FORCE, CUYAHOGA, COUNTY, OHIO

/s/ Mary W. Christensen
Mary W. Christensen
Christensen Christensen Donchatz Kettlewell
& Owens, LLP
100 East Campus View Blvd., Suite 360
Columbus OH 43235-4679
(614) 221-1832
(614) 396-0130 (Fax)
mchristensen@columbuslaw.org

For full article:

<http://www.cnn.com/2008/TECH/science/09/09/offshore.wind.ap/index.html?iref=newssearch>

Offshore wind farms may line U.S. coast

WASHINGTON (AP) -- Visitors to Rehoboth Beach, Delaware, soon may be greeted by more than sand dunes, seagulls and beach umbrellas.

Offshore wind farms, like this one near Denmark, are being proposed for the Atlantic coastline.

If offshore wind advocates have their way, scores of 140-foot blades will be spinning in the ocean breeze nearly a dozen miles away, barely visible to the sunbathers.

Offshore wind has taken a back seat to offshore drilling for oil and natural gas in the current energy debate. But those wind-driven turbines probably will be operating long before oil platforms appear off Atlantic Coast states.

Delaware hopes to be the first state to construct a wind farm off its coast. The project, scheduled to be completed in 2012, is one of several offshore wind proposals that have cleared significant hurdles in recent months.

Proponents say wind offers more long-term energy independence than offshore oil. Residents along the Eastern seaboard are embracing it as a stable-priced, environmentally friendly [energy alternative](#).

"When people see the price of gas hit \$4, they are very open to having discussions about alternatives," said Stephen Smith, executive director of the Southern Alliance for Clean Energy, a nonprofit group.

Wind energy today accounts for only 1 percent of the nation's electricity. A May report from the Energy Department concluded wind energy could generate 20 percent by 2030, with offshore sources accounting for nearly 20 percent of that. Projects mostly would be located along the [Atlantic](#) coast because the seabed floor elsewhere drops off too quickly to anchor turbines.

In [Delaware](#), offshore wind has caught everyone's imagination, said Patricia Gearity, a member of Citizens for Clean Power, a grass-roots organization

based in the state.

"People liked that it was homegrown wind, that we weren't going to import it from somewhere else," said Jeremy Firestone, a professor of marine policy at the University of Delaware.

Offshore wind supporters say recent proposals have not faced the same kind of opposition that previously dogged projects off Massachusetts' Cape Cod and New York's Long Island. But even on Cape Cod, attitudes are changing. Where critics once held a floating anti-wind farm demonstration, polls show that public opinion has swung in favor of an offshore project.

The Long Island project was scrapped last year. But fishermen in neighboring New Jersey who once opposed offshore wind power have banded together to submit one of five bids for a 350-megawatt wind farm that would produce enough electricity for up to 100,000 households. Rhode Island may select a developer this fall for a wind energy project.

Delaware residents took to the blogosphere, called their legislators and turned out in droves at public hearings to push for the proposed project off Rehoboth Beach. It stalled last year, but months of negotiations and strong grass-roots organizing resulted in its approval by the Delaware Legislature in June.

"During that period of time, you saw headline after headline roll out about the increase in prices, not only in oil, not only in gas, but the big spike in natural gas and propane costs," said Gearity, a 58-year-old retired lawyer.

The project, proposed by Bluewater Wind, would include between 60 and 200 wind turbines spaced about a half mile apart. Delmarva Power has agreed to buy electricity from the project for 25 years. Bluewater is owned by the global investment firm Babcock & Brown, which operates wind farms in several states.

For each turbine, a pole would be hammered about 90 feet below the seabed floor. Another pole would rise above the water with three 140-foot spinning blades at the top. At the highest point, the turbines would reach up about 400 feet; by comparison, the Washington Monument is about 555 feet.

Unlike its mid-Atlantic neighbor, the Cape Cod project has faced vocal and well-funded opponents who complained it would mar the ocean vista. Rising energy prices have made that argument less persuasive, said Barbara Hill, executive director of Clean Power Now, an independent Hyannis, Massachusetts-based organization that favors the project.

The 130-turbine project has now cleared most of the regulatory hurdles and

proponents are hopeful it will be in operation within four years.

Cape Wind Associates, a subsidiary of the New England power company Energy Management Inc., has spent more than \$30 million on the Massachusetts project, investing profits from its natural gas-fired power plants, said Cape Wind spokesman Mark Rodgers.

In New Jersey, Daniel Cohen, the president of the offshore wind developer Fishermen's Energy, said the organization reassessed its opposition, deciding to view offshore wind as an opportunity, not a threat.

"The public has a heightened interest to finding solutions in what it sees as a growing problem in our dependence on fossil fuels," said Cohen, who owns Atlantic Capes Fisheries in Cape May, New Jersey. Fishing company owners have put up the money for the project's development stage.

Significant obstacles to offshore wind still remain.

Policymakers and utility companies need to commit to long-term contracts, said Firestone, the University of Delaware professor. He pointed out that New Jersey and Rhode Island still do not have buyers for the power from the proposed projects.

There also needs to be more stability in the federal government's support for wind power, said Laurie Jodziewicz, manager of siting policy at the American Wind Energy Association.

When Congress allowed a renewable energy tax credit to expire in the past -- in 2000, 2002 and 2004 -- wind capacity installation dropped 93 percent, 73 percent and 77 percent respectively from the previous year. A current tax credit is set to expire Dec. 31.

Proponents point out that most of the technology hurdles have been cleared, though costs remain high. They look at the almost 1,100 megawatts of offshore wind farms in European waters and say the Cape Cod and projects could jump-start offshore wind energy in the United States.

"This will be a game-changer once this project is built," said Hill, the Cape Wind advocate. "We are going to be dancing on Craigsville Beach someday, looking out and seeing the turbines spinning." [E-mail to a friend](#)

The foregoing document was electronically filed with the Public

Utilities Commission of Ohio Docketing Information System on

9/9/08 4:30pm

in Case No. 08-888-EL-ORD

Summary: the Great Lakes Energy Development Task Force submits Supplemental Authority to its Initial Comments regarding Staff-proposed Rules: New Chapter 4901:1-39 and 4901:1-40, Ohio Administrative Code

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/9/2008 4:38:46 PM

in

Case No(s). 08-0888-EL-ORD

Summary: Comments Submission of Supplementary Authority to Intial Comments of Great Lakes Energy Development Task Force regarding Staff-proposed Rules electronically filed by Ms. Mary W. Christensen on behalf of Great Lakes Energy Development Task Force