

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.)

REPLY COMMENTS OF
GREAT LAKES ENERGY DEVELOPMENT TASK FORCE,
CUYAHOGA COUNTY, OHIO
AND REQUEST FOR OPPORTUNITY FOR SURREPLY COMMENTS AS NECESSARY

On behalf of the Board of Commissioners of Cuyahoga County, Ohio, the Great Lakes Energy Development Task Force (“GLEDTF”) submits these brief reply comments to the Public Utilities Commission of Ohio (“Commission”) in the above-named proceeding. As explained in its Initial Comments, GLEDTF is participating in this proceeding for a focused purpose regarding the value of renewable energy credits as it would apply to any offshore pilot wind project implemented in the Ohio Great Lakes area.

The critically important theme of the initial comments filed with the Commission in this docket by a great number and variety of interested parties is that the Commission must understand and exercise the breadth of authority that SB 221 gives the Commission to create incentives to facilitate the development of the advanced and renewable energy industries in Ohio. These comments clearly support what the task force requested in its initial comments, incentives to facilitate and encourage offshore wind pilot projects in Lake Erie—a first of its kind in the world.

Only if SB 221 is read this way, will the law be successful. If the Commission does not exercise authority consistent with the clear policy of Ohio Revised Code Section

4928.02, the goals of research, development, implementation and the funding for all that the law anticipates will not be met.

What makes this law different from so many others coming from Ohio's General Assembly is the expressed policy from the General Assembly to embrace the future and to use the authority of the State of Ohio to encourage the advanced and renewable energy industries and technologies that in many cases are still being developed and invested—just like GLEDTF's offshore pilot project. The law recognizes that the direction these industries and technologies may take are in large part still unknown. Therefore, a reading and implementation of the law to encourage risk taking in these industries must be an essential element of the rules to be adopted by the Commission. Only then can the conditions that may be necessary for many new entrants into the Ohio energy market to be drawn to Ohio, to invest in Ohio, to set up their businesses in Ohio be realized. So too, only then can Ohioans can enjoy reliable energy service, reduced air pollution and carbon emissions, lower utility costs, greater health, more employment opportunities, stronger communities and an economic and cultural presence as a player in the world market.

It is in this spirit that GLEDTF makes its request to the Commission regarding its proposed revision to its rules defining "renewable energy credit," wherever it appears in its rules. The unique opportunity for the development of wind power on the Great Lakes is one of those limited-time, financially-intensive opportunities for the State of Ohio to be the first in the world.

Finally, if reply comments are filed by any other party with respect to the GLEDTF's proposed amendment to the rules, the Task Force requests an opportunity to file surreply comments.

Respectfully submitted on behalf of
GREAT LAKES ENERGY DEVELOPMENT TASK
FORCE

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Reply Comments in PUCO Case No. 08-888-EL-ORD has been sent by first-class, postage prepaid U.S. Mail or by electronic e-mail to the parties of record listed below on this 26th day of September, 2008.

/s/ Mary W. Christensen
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Summary: Reply Reply Comments filed by the Great Lakes Energy Development Task Force, Cuyahoga County, Ohio and Request for Opportunity for Surreply As Necessary electronically filed by Ms. Mary W. Christensen on behalf of Great Lakes Energy Development Task Force