



Public Utilities
Commission

Case No.: 09-726-EL-REN

AFFIDAVIT
Arden
Staff Interrogatories – Initial Set

State of Texas

Houston
(Town)

County of Harris:

Paul Pabor, Affiant, being duly sworn/affirmed according to law, deposes and says that:

1. I am the duly authorized representative of WM Renewable Energy, LLC.
2. I have personally examined and am familiar with all information contained in the foregoing application, including any exhibits and attachments, and that based upon my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete.
3. The Applicant has obtained all required local, state and federal environmental permits.
4. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

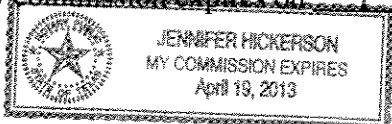
Paul Pabor Vice President
Signature of Affiant & Title

Sworn and subscribed before me this 27 day of October, _____ Month/Year

Jennifer Hickerson
Signature of official administering oath

Jennifer Hickerson, Notary
Print Name and Title

My commission expires on 4-19-13



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Question 1: In the Name of the Facility Owner Section of the application, the organization is WM Renewable Energy, L.L.C. Please provide a name for the representative of the organization and the title of this person.

Answer 1:

Paul Pabor, Vice President, Organization Representative

Question 2: In the Section of the application referring to the information under which you will do business in Ohio, the organization is WM Renewable Energy, L.L.C. Please provide a name for the representative of the organization and the title of this person.

Answer 2:

Paul Pabor, Vice President, Organization Representative

Question 3: The Qualified Resource or Technology Section of the Application requests a written description of your system. Please provide this information.

Answer 3:

Facility Description: Landfill methane gas is recovered via a series of wells drilled into the landfill. The wells are connected by a common pipe system that collects the methane gas and transports it to a nearby compression facility. At the compression facility, the landfill methane gas is de-watered, filtered and pressurized; thereafter, it is then used to fuel generators that produce renewable energy.

The facility is not a customer-owned renewable distribution generation system.

Question 4: The Qualified Resource or Technology Section of the Application Form requests a detailed description of how the output from the facility is going to be measured and verified and a description of the meter configuration. Please provide this information.

Answer 4:

The facility is not considered a behind-the-meter facility. Output from the facility will be measured and verified through PJM settlement system. Facility located in geographical area of PJM Interconnection, L.L.C. Regional Transmission Organization.

Question 5: From the Qualified Resource or Technology Section of the Application, please provide digital photographs that depict an accurate characterization of your

installed system and the dates the photographs were taken, i.e., please send us photographs of your generating facilities.

Answer 5:

See attached photograph of installed system and photographed on 10/21/09.

Question 6: Please respond to the question in regard to whether or not you are a mercantile customer.

Answer 6:

Mercantile customer not applicable

Question 7: In the regional transmission section of the application, you identify that you are in the West Penn Power Company area. You also describe that PJM is the balancing authority operator for your facility. Does that mean that your facility is located in the geographic area of PJM Interconnection, L.L.C?

Answer 7:

WM Renewable Energy, L.L.C. is located in a geographical area of PJM Interconnection, L.L.C. and PJM is the balancing authority.

Question 8: In the regional transmission section of the application, you identify that you are a member of ISO New England and that PJM is the balancing authority operator. Could you please explain why you are not a member of the PJM regional transmission organization and why you are a member of ISO New England?

Answer 8:

WM Renewable Energy, L.L.C. is not a member of a regional transmission organization due to small-scale generation, but instead utilize a scheduler that is a PJM member.

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Case No(s). 09-0726-EL-REN

Summary: Application Arden - 09-726-EL-REN Initial Interrogatory Set electronically filed by Mrs. LaToya R Glenn on behalf of WM Renewable Energy, LLC