

**Case No. 12-2255-EL-REN**

**Rice, Randall Residence - R Rice**

**Staff Interrogatories – Initial Set**

Question 1: The starting date for recognition of historical generation provided in section O of this application is May 1, 2011, but PJM-GATS records for ID # NON63460 recognize historical generation from April 1, 2011. Which retroactive generation date are you using for this facility for recognition of RECs in Ohio?

Answer: We will be using April 1, 2011

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**O. Start date from which applicant requests to begin reporting generation towards the creation of Renewable Energy Credits (RECs) for Ohio's purposes**

The start date from which an attribute tracking system will begin to count generation data toward the creation of renewable energy credits for Ohio's purposes will be the date of certificate issuance in the state of Ohio (i.e. generation prior to the date of certification would not be recognized), unless the facility satisfies one of the criterion established in the Commission's June 17, 2009 Entry on Rehearing issued in Case No. 08-888-EL-ORD.

In that Entry, the Commission found it to be appropriate to recognize the creation of RECs back to July 31, 2008, the date in which the Ohio alternative energy portfolio standard law became effective, provided that "The facility was a participant in an existing attribute tracking system during that time or had a meter in place which can accurately demonstrate generation levels from July 31, 2008 forward." (June 17, 2009 Entry on Rehearing at 34.)

(1) Existing attribute tracking system:

- a. For facilities that are currently participating in an attribute tracking system, it is not sufficient to merely be registered with the tracking system; you also must be reporting generation data.
- b. If the facility was a participant in an existing attribute tracking system, please state the specific start date that will be used to recognize historical RECs.

(2) Meter which can accurately demonstrate generation levels from July 31, 2008:

- a. For facilities which have had a meter in place, accurately demonstrating generation levels must include documentation from an electric remote monitoring and reporting system, from the specified start date, and recorded on at least a monthly basis.
- b. If the facility had a meter that accurately demonstrates generation levels, please state the specific start date, and attach documentation from the remote monitoring and reporting system.

Note: An application that leaves section O blank, or does not include the required documentation, will be assigned a start date for Ohio that corresponds with the date of Ohio certification.

If the facility was a participant in an existing attribute tracking system, please state the specific start date, in accordance with the tracking system's rules, that will be used to recognize historical RECs: ~~05/01/2011~~ 04/01/2011

If the facility had a meter that accurately demonstrates generation levels, please state the specific start date, and below insert documentation from the remote monitoring and reporting system:

Also, in the Commission's Entry on Rehearing, the Commission explained that consistent with its policy on double counting, the Commission "will not retroactively recognize any past RECs which have been sold or otherwise consumed." (June 17, 2009 Entry on Rehearing at 34.)

Has any of the generation of the facility been tracked as RECS that have been sold or otherwise consumed? No

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Summary: Memorandum Reply to Staff Interrogatories about Section O electronically filed by Mr. Brad Bowery on behalf of Mr. Randall Rice