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March 3, 2014

Mr. Todd Snitchler – Chairman
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

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PUCO

Re: PJM EIS Comments to Ohio Case No 13-652-EL-ORD

Dear Mr. Snitchler:

PJM Environmental Information Services (“PJM EIS”) hereby responds to your invitation for comments for Case No. 13-652-EL-ORD: In the Matter of the Commission’s Review of its Rules for the Alternative Energy Portfolio Standard Contained in Chapter 4901:1-40 of the Ohio Administrative Code.

The Public Utilities Commission of Ohio (“Commission”) Staff (“Staff”) have provided several topics for consideration, one of which is associated with the Commission’s requirement to include in its annual reports to the General Assembly the average annual cost of renewable energy credits purchased by the utilities and companies for the year covered in the report.

Staff is considering different options for compiling the cost data. PJM EIS does not offer an opinion on which option is best for Ohio. However, one of the options under consideration is coordinating with the recognized attribute tracking systems to initiate a cost disclosure requirement. PJM EIS would like to comment that if this option is selected, the Generation Attribute Tracking System (“GATS”) already has the capability for a user to enter the price paid per Renewable Energy Credit (“REC”) when a REC is retired for compliance with a state Alternative Energy Portfolio Standard (“AEPS”). The price paid per REC can be an optional or required field, and this is configurable by state. Regardless of whether the field is optional or required, the value entered by the account holder in GATS is included on the “My RPS Compliance” report which is available to view, print, or download from the Commission’s GATS account. In summary, no changes would be required to GATS if it is decided to initiate a cost disclosure requirement through the attribute tracking systems.

PJM EIS offers the following suggestions on the proposed AEPS Rule changes in 4901:1-40-04, Qualified Resources (Attachment B, page 15 of 26), which read as follows:

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- (3) To demonstrate compliance with a renewable energy resource benchmark, an electric utility or electric services company must retire the requisite renewable energy credits with one of the following attribute tracking systems:

 - (a) The PJM's generation attributes tracking system,
 - (b) The MISO's midwest renewable energy tracking system, or
 - (c) Another credible tracking system approved for use by the commission.
- (4) A REC may be used for compliance any time in the five calendar years following the date of its creation by the applicable attribute tracking system year in which the associated electricity was generated.
- (5) Double counting is prohibited.
- (6) The RECs must be associated with electricity that was generated no earlier than July 31, 2008 for resources or technologies included in the definition of "renewable energy resources" by Amended Substitute Senate Bill 221 (127th General Assembly). For resources or technologies added to the definition of "renewable energy resources" by Amended Substitute Senate Bill 315 (129th General Assembly), the RECs must be associated with electricity that was generated no earlier than September 10, 2012.
- (7) The RECs must be associated with electricity that was generated no later than the end of the compliance year.

Under item (3), PJM EIS would like to point out that while GATS (owned and administered by PJM EIS) tracks all PJM generation (renewable or not), it is not limited to tracking generation in the PJM region. GATS can be used to track any generating resource that qualifies for an AEPS in Ohio or any other state within the PJM region, regardless of where that resource is located. Many such resources are located outside of the PJM region in the Midcontinent ISO (MISO), the New York ISO, or elsewhere. For example, there are currently 226 registered renewable generators in GATS certified by the Commission as qualified for the Ohio AEPS that are located outside of the PJM region.

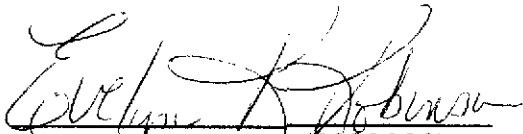
In contrast, MISO does not have a dedicated renewable energy tracking system for generating resources within its footprint. MISO-located resources can choose to be tracked in any one of at least four tracking systems, including GATS and the Midwest Renewable Energy Tracking System (MRETS), depending on their business needs.

With respect to REC lifetime (item (4)), PJM EIS suggests that the expiration of a REC should be changed to be based on the year in which the associated electricity was generated, rather than the year in which the REC was created by the applicable attribute tracking system. This would make it consistent with the eligibility requirements in the paragraphs immediately following which are based on when the associated electricity was generated. Furthermore, when most people in the industry talk about REC vintage (for pricing, etc.) they are talking about when the generation occurred (an Ohio 2013 in-state REC, for example). It might cause some confusion to those parties doing business in multiple states if the Ohio REC life is based on a date other than when the associated electricity was generated. Since the REC creation date in GATS is usually just a month after the associated electricity was generated, this change should have little or no effect on the compliance years in which a REC can be used.

PJM-EIS respectfully requests the Commission to consider the recommendations contained within these comments.

Respectively submitted,

Ken Schulyer
President, PJM EIS



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