

FILE

13-0990-EL-BGN

Irwin, Steven

**From:** Tom Stacy <tfstacy@gmail.com>  
**Sent:** Tuesday, May 06, 2014 6:46 PM  
**To:** Irwin, Steven  
**Cc:** PUCO ContactOPSB  
**Subject:** Re: OPSB e-mail

Thanks Steve. I appreciate you guiding me to the specific condition dealing with decommissioning.

Perhaps amended Senate Bill 310 will find its way into the law and things will quiet down a bit.

All the best.

Tom Stacy

On May 6, 2014, at 3:19 PM, "Irwin, Steven" <[steven.irwin@puc.state.oh.us](mailto:steven.irwin@puc.state.oh.us)> wrote:

Mr. Stacy,

The Staff Report of Investigation for the Greenwich Windpark Project (13-0990-EL-BGN) is available here: <http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=79651d26-e44c-4e87-8a8f-e55ac69f7a93>. Condition #47 discusses decommissioning.

Thanks,

Steve

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Steve Irwin  
Public Outreach Coordinator  
Ohio Power Siting Board  
614.466.2871  
[OPSB.ohio.gov](http://OPSB.ohio.gov)  
<image001.png>

**From:** Tom Stacy [<mailto:tfstacy@gmail.com>]  
**Sent:** Monday, May 05, 2014 5:09 PM  
**To:** Irwin, Steven  
**Cc:** PUCO ContactOPSB  
**Subject:** Re: OPSB e-mail

Hi Steve.

Thanks for your reply. I did not mention proof of basis of need, although since you bring it up the lack of such a requirement (specifically governed by LDA summer capacity + reserve margin sufficiency) by OPSB is certainly unfortunate for Ohio ratepayers since there is no other governance on over-capitalization and resulting under-utilization of the power plant fleet. As I am sure you realize, under-utilization of high capital cost generating plants can result in rate cases if those incumbent plants were granted a guaranteed rate of return by PUCO when they were constructed. Under-utilizing our dependable, high capacity value fleet may risk making

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Ohio a less competitive state for energy intensive business to operate in. This is especially true in a market with flat projected demand growth and when stable, continuous operation of base load plants is altered by artificially low bids from wind energy producers whose variable costs are low, and then driven negative by production subsidies like the Federal PTC and State REC.

As far as a decommissioning assurity bond, I assume the bond is fully funded even if *decommissioning occurs in early years of the project's operation? Still it would be unfortunate if* a developer were to count on a certain amount of generation and then end up producing 27% less. I did note, however, that the blades on these particular machines are incredibly long. With all the problems with blade integrity across the industry it is hard to believe there are deployable designs that much longer!

Thanks for your reply, and please feel free to contact me any time.

On Mon, May 5, 2014 at 3:52 PM, Irwin, Steven <[steven.irwin@puc.state.oh.us](mailto:steven.irwin@puc.state.oh.us)> wrote:

Mr. Tom Stacy  
6638 County Road 10  
Zanesfield, Ohio 43360

Mr. Stacy,

Thank you for contacting the Ohio Power Siting Board (OPSB) regarding case number 13-0990-EL-BGN. This project is known as the Greenwich Windpark and is located in Greenwich Township, Huron County.

As specified under Ohio Revised Code 4906.10(A)(1), proof of the basis of need is not required for the certification of any generation facility, regardless of energy source.

In the Staff Report of Investigation for this project, the OPSB Staff recommends that the certificate for the facility be subject to 53 conditions, including those that require the posting of financial surety for the decommissioning of the project. These funds would be designed to protect the local communities with the security that if a developer "moves on" from a project, the project will be decommissioned.

Sincerely,

Steve

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Steve Irwin  
Public Outreach Coordinator  
Ohio Power Siting Board  
[614.466.2871](tel:614.466.2871)  
[OPSB.ohio.gov](http://OPSB.ohio.gov)  
<image001.png>

From: [webmaster@puc.state.oh.us](mailto:webmaster@puc.state.oh.us)  
To: PUCO ContactThePUCO  
Subject: 80983  
Received: 5/2/2014 10:23:33 PM

Message:  
WEB ID: 80983 AT:05-02-2014 at 10:23 PM  
Related Case Number:  
TYPE: comment  
NAME: Mr. Tom Stacy  
CONTACT SENDER ? Yes  
MAILING ADDRESS:

- 6628 County Road 10
- Zanesfield , Ohio 43360
- USA

PHONE INFORMATION:

- Home: (937) 407-6258
- Alternative: (937) 407-6258
- Fax: (937) 407-6258

E-MAIL: tfstacy@gmail.com

INDUSTRY:Electric

ACCOUNT INFORMATION:

- Company: N/A
- *(no account name provided?)*
- *(no service address provided?)*
- *(no service phone number provided?)*
- *(no account number provided?)*

COMMENT DESCRIPTION:

This comment pertains to OPSB Case 13-0990-EL - The Huron Wind project. The applicant claims its 60 MW wind project will generate 210 GWHs of electricity per year. That's a 40% capacity factor! The highest demonstrated capacity factor in Ohio to date is 29%. Maybe you should ask them if they can afford reality or if their financing imposes fixed cost obligations in excess of what they can afford. A 27% lower than expected revenue figure year after year will catch up with someone eventually. But likely the developer people will have made their stash and moved on by then. In any case they seem to be taking great liberties with the truth in their estimated capacity factor. But maybe keeping them honest isn't within the OPSB's scope of authority or even interest. Who is John Galt?

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Tom Stacy