

April 30, 2014

**Case No. 14-0442-EL-REN and 14-0443-EL-REN
Hubbard Development, Co., LLC-IN-PV-20.2kW Facility-2 and
Hubbard Development, Co., LLC-IN-PV-20.2kW Facility
Staff Interrogatories – Initial Set**

Question 1: In section **G.3** of the applications, the presented photographs appear to be of the same PV array. Please provide additional photographs that clearly depict which panels belong to each application and that visibly show all of the modules for each.

Answer 1: We have confirmed that these are two separate systems sent through separate utility meters. These are two separate systems that are located on **one parking lot** in one apartment complex, which is why the photos look so similar.





May 16, 2014

**Case No. 14-0442-EL-REN
Hubbard Development, Co., LLC-IN-PV-20.2kW Facility-2
Staff Interrogatories –Second Set**

Question 1: In order for Staff to perform a thorough review, it is important that each module in the array is delineated. In section **G.3** of the application, **110** panels can be distinguished from the current photograph. In section **G.4b** of the application, it is stated that there is a total of **102** modules. Please provide an additional photograph(s) that clearly depict which 102 panels belong with this application (if notations are necessary on the photos, please include these).

Answer 1: There are a total of 204 panels producing power (two systems – 102 modules each) and there are total of 207 panels on the parking structure. So, there are 3 panels which are not connected. I believe they are located in the northwest corner of the structure.



**Case No. 14-0443-EL-REN
Hubbard Development, Co., LLC-IN-PV-20.2kW Facility
Staff Interrogatories –Second Set**

Question 1: In order for Staff to perform a thorough review, it is important that each module in the array is delineated. In section **G.3** of the application, **135** panels can be distinguished from the current photograph. In section **G.4b** of the application, it is stated that there is a total of **102** modules. Please provide an additional photograph(s) that clearly depict which 102 panels belong with this application (if notations are necessary on the photos, please include these).

Answer 1: There are a total of 204 panels producing power (two systems – 102 modules each) and there are total of 207 panels on the parking structure. So, there are 3 panels which are not connected. I believe they are located in the northwest corner of the structure.



Please let me know if you have any further questions and thank you for your cooperation.

Best,

Anna Noucas
Senior Associate
Sol Systems, LLC

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Case No(s). 14-0442-EL-REN

Summary: Reply reply to staff interrogatory electronically filed by Ms. Anna Noucas on behalf of Hubbard, Daniel