Buckeye Power received the following question from the PUCO on 7/9/2018:

QUESTION (from PUCO):

I am in the process of reviewing the application filed in case no. 18-0705-EL-REN, for which you are listed as the regulatory contact.

While the application generally appears to be in order, I do have a couple of questions pertaining to South Central Power's "OurSolar" renewable program. Specifically I am interested in how the South Central Solar 1 facility fits into this renewable program, and if there is any potential for double-counting of the associated S-RECs (if certified).

By <u>Commission rule</u>, double-counting is currently defined as follows:

- (M) "Double-counting" means utilizing renewable energy, renewable energy credits, or energy efficiency savings to do any of the following:
 - (1) Satisfy multiple Ohio state renewable energy requirements or such requirements for more than one state.
 - (2) Comply with both the energy efficiency and advanced energy statutory benchmarks.
 - (3) Support multiple voluntary product offerings.
 - (4) Substantiate multiple marketing claims.
 - (5) Some combination of these.

Through the PUCO renewable certification process, is the Company simply looking for the ability to market any S-RECs from the South Central Solar 1 facility that aren't otherwise subscribed under the company's OurSolar program? And if so, please explain how this will be managed to ensure no double-counting occurs.

RESPONSE (from Buckeye Power):

The OurSolar program is an opportunity for member consumers of the electric cooperative to request solar power as part of their custom portfolio. We internally track how many panels are subscribed to members. This is done via agreement with the member consumer. The consumer's monthly bill reflects how many panels they have subscribed and how many kWhs those panels produced during the billing month.

We do not plan to sell or transfer any remaining RECs from unsubscribed panels, but we would still like to pursue certification.

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in

Case No(s). 18-0705-EL-REN

Summary: Response Response to PUCO question regarding OurSolar electronically filed by Mrs. Kara Smith on behalf of Buckeye Power, Inc.