

**IN THE MATTER OF THE APPLICATION OF BEEBE 1B FOR CERTIFICATION AS AN ELIGIBLE OHIO
RENEWABLE ENERGY RESOURCE GENERATING FACILITY.**

CASE NO. 18-1125-EL-REN

**MICHIGAN PUBLIC POWER AGENCY RESPONSES TO THE PUBLIC UTILITIES COMMISSION OF OHIO
QUESTIONS ISSUES ON 10/17/2018**

1) The application includes information for both Exelon Generation Company and the Michigan Public Power Agency. Please explain the relationship between these two entities as pertains to the renewable energy credits (RECs) associated with the Beebe 1B wind facility.

Michigan Public Power Agency purchases from Beebe 1B Renewable Energy, LLC power and RECs generated by the Beebe 1B Wind Project. Beebe 1B Renewable Energy, LLC is an indirect subsidiary of Exelon Generation Company, LLC.

2) The facility is currently registered on MIRECS (ID = GEN314), correct?

Yes, currently registered in MIRECS under MIRECS ID = GEN 314

3) The facility is currently not registered on M-RETS, correct?

Correct, not registered in M-RETS, only registered in MIRECS at this time. MPPA will update section K on the application if we need to re-submit or re-file.

4) Is the facility proposing to de-register from MIRECS and instead register with M-RETS? If so, when would these steps be completed?

No, the Beebe 1B Wind Project will remain registered in the MIRECS system, MPPA will accept REC transfers within MIRECS from Exelon Qualified Reporting Entity (QRE) as we have done historically and then MPPA will transfer these Beebe 1B Wind Project RECs from the MIRECS tracking system to MRETS tracking system.

5) If the facility was to remain registered on MIRECS, is the facility eligible for any multiplier RECs or incentive RECs (i.e., anything other than 1 REC per 1 MWH)? If yes, please explain.

No, the Beebe 1B Wind Project is not eligible for any multiplier RECs or incentive RECs, this is a wind project with no additional incentive RECs produced.

6) If the applicant is proposing a system of REC transfers between tracking systems, please explain the proposed system. In your explanation, please include details on the protections in place to ensure that no double counting occurs between tracking systems.

Currently, Exelon QRE uploads the generation data to the MIRECS system to create the RECs, MPPA is proposing that this would continue to be the REC loading process and that MPPA would transfer these RECs from MIRECS to MRETS once loaded into the MIRECS system. There will be no double counting because these RECs will only be created or generated once within the MIRECS system as we have done historically. This is why MPPA and Exelon will leave the Beebe 1B Wind Project registered within the MIRECS system and simply transfer these RECs to the MRETS system after the fact.

7) If certified, Exelon would then market these RECs to companies with an Ohio RPS compliance obligation, correct?

No, MPPA would market the RECs to Ohio RPS Compliance obligation as MPPA owns the RECs once we have purchased the power from Beebe 1B Wind Project from Exelon.

8) Section G of the application includes discussion of the existing metering configuration, while Section N of the application includes details on two separate meters. Please clarify which meter(s) would be used for reporting the output from Beebe1B for purposes of REC creation.

Review formula / equation on top of page 7 from word document to provide description of the existing meter configuration.

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Summary: Response Michigan Public Power Agency responses to Ohio Public Utilities Commission questions regarding Beebe 1B Wind Project REN Application. electronically filed by Patrick J Devon on behalf of MICHIGAN PUBLIC POWER AGENCY