



Response to inquiry from Staff of 07/08/19 for Case # 19-1221 EL-REN

Staff Question One:

Page 3 of the application indicates that "It is the intent of the owner to delist the facility from MIRECS and list it with GATS upon certification as an Ohio Renewable Generator." Assuming the facility is certified effective 8/19/19, when are the latest dates that the owner would (a) delist with MIRECs, and (b) register with GATS?

Response:

MIRECs has a three-month period between date of actual generation and the RECs posting to the respective MIRECs account. It is the facility owner's intention to capture RECs generated in June within MIRECs and upon receipt, delist the facility in MIRECs, register with GATS and input generation data from July 1 and forward into GATS. We anticipate this to occur between September 1, 2019 and October 1, 2019. We are assuming the certification effective 08/19/19 would apply retroactively to the date of application, 06/19/19.

Staff Question Two:

When checking the 2018 Form EIA-860 Data Schedule 3, "Generator Data" it shows the following for the facility:

	Nameplate	Placed
<u>Unit</u>	<u>Capacity (MWs)</u>	<u>In-Service</u>
1	0.8	January-98
2	0.8	January-98
3	0.6	November-10
4	1.6	November-12
5	1.6	November-12

As the data differs slightly (units 1&2 capacity and placed in-service dates) from what was provided in section I.1 of the application, please either confirm or correct the data from Section I.1.

Response:

In regards to the capacity variance, Units 1 & 2 were originally 0.8 MW units as identified in the EIA form 860. However, these units were replaced with 1.6MW units, unit 1 on 10/13/16 and unit 2 on 11/09/18. We used the earlier placed in service date to reflect start of generation at the facility and used the current engine size to reflect current operations at the facility.

In regards to the Placed In Service variance, we reviewed the information with the current project owners and they suspect a typo in the information sent to us for application completion is the cause. The stated online date of 11/21/98 should have been 01/21/98

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Staff Question Three:

When reviewing the MIRECS public report of registered facilities, it shows GEN46 as 5.4 MWs and GEN178 as 0.65 MWs. In the certification application, it shows the total facility capacity as 7 MWs. Please clarify the apparent difference in these total capacity numbers.

Response:

The facility owner used net production to the grid and reduced the capacity by station power requirements to arrive at lower capacity numbers in addition to using the original generating units as identified in the above question and response. The application reflects the nameplate capacity of the generating units. Units 1, 3, 4 & 5 are GEN46 and Unit 2 is GEN178.

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Summary: Response Clear Energy Response to Staff Inquiries of 07/08/19 electronically filed by Ryan Cook on behalf of Energy Developments, Inc and Cook, Ryan Mr.