



Northwest Ohio Wind, LLC

January 6, 2020

Public Utility Commission of Ohio (PUCO)
The Ohio Power Siting Board (OPSB)
180 East Broad Street
Columbus, Ohio 43215

References: Northwest Ohio (NWO) Wind Project, OPSB Case Nos. 13-197-EL-BGN, 16-343-EL-BGA, 16-1687-EL-BGA, and 17-1099-EL-BGA; PJM Interconnection Service Agreement V1-011

Subject: Notice of 3 MW_{DC} Solar PV Plus Storage Asset Addition to NWO Wind Project

To Whom it May Concern,

Northwest Ohio Wind, LLC (NWO), f/k/a Trishe Wind Ohio, LLC, or one of its affiliates is planning to construct solar and battery storage production assets in Paulding County, behind the existing meter and point of interconnection (POI) of the Northwest Ohio Wind Project with AEP Ohio Transmission. Under a separate interconnection filing with PJM Interconnection, LLC (PJM), we will be requesting either no additional net power delivery to PJM's bulk electric system (BES) beyond what the Wind Project is approved to produce, or a maximum increase of 2.5 megawatts (MW_{AC}) to 102.5 MW_{AC}. This supplemental generating resource will offset auxiliary loads consumed by the existing Wind Project and supplement the variable wind energy delivered to the BES, enabling further learnings of hybrid solar/wind and battery storage capabilities and benefits. Regardless, the new solar and storage assets will operate seamlessly with the Wind Project and do not constitute a substantial addition to the Wind Project.

We reviewed Ohio Revised Code Chapter 4906 and Rule 4906 of the Ohio Administrative Code, with a particular focus on whether this planned project triggered any additional approvals or changes to the Wind Project's referenced OBSB certificate and stipulated conditions therein. First, the planned solar plus storage assets are not a "major utility facility" or "economically significant wind farm" that require a certificate under Ohio Revised Code Chapter 4906. This is because the planned assets will yield far less than the fifty MW_{AC} threshold necessary to be a major utility facility under Section 4906.1(B), and do not use wind resources, so said assets are not an economically significant wind farm under Section 4906.13(A).

Nor do the planned solar plus storage assets constitute an addition to the Wind Project that would trigger a certificate amendment. A "substantial addition" in electric power generation is defined under Rule 4906-1-01(LL) as "any modification of an operating generation plant which modification in itself constitutes a major utility facility or economically significant wind farm". Additions cited under this definition include, but are not limited to: (1) fifty megawatts or greater generation added to an existing plant; (2) a fifty megawatt or greater generating unit designed to operate in conjunction with an existing unit to establish a combined-cycle unit; (3) a generating unit added to an existing plant which is not a major utility facility, or modification of an existing

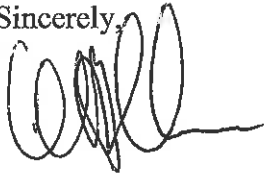
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unit, with the result that the combined capacity is fifty megawatts or greater; and (4) wind generation added to an existing wind farm, with the result that the combined capacity of the new facility is five megawatts or greater.

Because the planned solar plus storage assets will generate less than five MW_{AC} and do not create any of the situations covered in Rule 4906-1-01(LL), our interpretation is that said assets do not constitute a new major utility facility, economically significant wind project or "substantial modification" that triggers OPSB approval or amendment. Indeed, this additional generation is very small in scale, and is aligned with goals of expanding the State of Ohio's renewable energy footprint. Such assets do require the approval of PJM and AEP Ohio Transmission and all construction will meet State/County regulations and will occur on land already owned by NWO that houses the Wind Project administration building and substation. As such, we are treating this letter as purely a notice of intention with PUCO/OPSB.

In the event that the OPSB or Public Utility Commission of Ohio have any questions, concerns, or additional data needs with this planned addition, we request immediate response back to me and Mr. Adam Smith of CMS Energy, One Energy Plaza, Jackson, MI 49201 or adam.smith@cmsenergy.com. We intend to file the Attachment Y Interconnection Request for the planned project with PJM Interconnection in the next two weeks.

Sincerely,

A handwritten signature in black ink, appearing to read 'CHUCK', with a long horizontal line extending to the right.

Charles Hookham
Executive Director, Projects
chuck.hookham@cmsenergy.com
Ph. 517-416-4721

cc. A. Smith (CMS Energy)
M. Smith (NWO Wind, LLC)

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 13-0197-EL-BGN

Summary: Correspondence from CMS Energy regarding solar pv and storage additions electronically filed by Raymond W. Strom on behalf of PUCO Staff