

From: [John Seck](#)
To: [Siegfried, Stuart](#)
Cc: [Clingan, Kristin](#)
Subject: RE: OH REN Application: Buckeye Wind Energy Center
Date: Wednesday, March 17, 2021 4:56:11 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Stuart,

Thanks for your assistance in the Application for Certification process related to Buckeye Wind Farm. Our answers to your questions are below. If you are still agreeable to doing so, we request and would very much appreciate that PUC Staff e-file our responses in the docket on our behalf. If not, please let me know and we will e-file the responses.

1. The application currently lists KMEA as the facility owner. Please either confirm or correct the required facility owner information.

KMEA Response: Correct information that should appear in Part B, "Facility Owner", of the application is as follows:

Legal Name of Facility Owner:	Buckeye Wind Energy LLC
Facility Owner Representative:	Brian Pekron (Buckeye Wind Farm asset manager)
Street Address:	1 South Wacker Drive, Suite 1800
City:	Chicago, Illinois
Zip Code:	60606
Country:	United States

2. Provide the meter manufacturer, meter type, and serial number for the meter(s) used to measure the facility's output. Our focus here is the meter(s) that will be relied upon when reporting to the attribute tracking system.

KMEA Response: Details of the Buckeye Wind Farm revenue meter, which will be relied upon for tracking system reporting, are as follows:

Meter Manufacturer:	Schweitzer Engineering Laboratories
Meter Type:	SEL-735
Meter Serial Number:	3151410374

3. Please provide a photo of the meter(s) referenced in the prior question. The photo(s) should show the meter's serial number and lifetime output at time of photo.

KMEA Response: See attached photos, taken in March 11, 2021, of the Buckeye Wind Farm revenue meter. The picture labeled "Buckeye Wind Farm, meter photo #1" displays total output of the facility, while "Buckeye Wind Farm, meter photo #2" shows a broader perspective and includes the serial number.

4. Please provide a photo of the facility – a map/layout photo of the facility would suffice, given the size of the facility.

KMEA Response: See attached "Buckeye Wind Farm facility map".

5. Re: the attribute tracking system, please indicate if the facility is currently registered on GATS. If not, please describe the plans and schedule for registering with GATS.

KMEA Response: KMEA's share of Buckeye Wind is not currently registered with GATS. However, we have been in contact with GATS, understand their account and generator registration process, are agreeable to their terms, and are fully committed to promptly establishing a GATS account upon certification so that all of KMEA's Buckeye Wind Farm RECs will be minted and accounted for there.

6. I understand from the [KMEA website](#) that KMEA has a purchase agreement with Buckeye Wind Energy, LLC. Does this agreement include the RECs/environmental attributes? And is the KMEA purchase agreement for approximately 41 MWs of the facility's total 200 MWs?

KMEA Response: Indeed, on behalf of its member municipal electric utility owners Kansas Municipal Energy Agency (KMEA) is party to a 20-year Power Purchase Agreement (PPA) for 41.70 MW of the 200.48 MW facility that commenced operation commercially in 2015. The PPA includes the following language which transfers all of the renewable attributes related to KMEA's 41.7 MW share from the "Seller", Buckeye Wind Energy LLC, to us, the "Buyer", KMEA:

- "Throughout the Settlement Term, Seller shall, subject to the satisfaction of Buyer's payment obligations hereunder, transfer to Buyer, and Buyer shall accept from Seller, all of Seller's right and title to, and interest in, the Buyer's Environmental Attributes."

Should it be required by the PUCO, KMEA can provide a copy or a redacted copy of the PPA with the understanding it not be made public in this case docket.

7. The PUCO has a rule prohibiting the double-counting of RECs under the Ohio RPS. Does KMEA rely on the RECs/environmental attributes from the Buckeye Wind Energy Center to offer green products to its members and/or to support any other organizational sustainability/environmental objectives, and if so, what steps will be taken to ensure there is no double-counting of RECs if this facility is certified in Ohio?

KMEA Response: KMEA has strict internal controls and does not claim any REC that is sold for any internal/member green or environmental claim. While KMEA does not offer green products to its members per se, each member owner is given the choice, via an annual 'REC Directive' form, to instruct KMEA to either retire or sell their share of the Buckeye Wind Farm RECS. KMEA retains the fully executed REC Directive forms and, on behalf of member cities that wish to retire their RECs, promptly executes retirements once RECs are minted, ensuring that they cannot later be sold. In the REC Directive form it is made clear to KMEA members the implications of their choice to retire or sell. Excerpts from the REC Directive form follow:

- "By selling, the city relinquishes claim to the environmental attributes associated with the RECs, which are transferred to the buyer's registry account when the transaction is closed."
- "Renewable Energy Certificates, or "RECs", are market based, legally recognized, tradable instruments that are issued for every one megawatt-hour (MWh) of

electricity generated at qualifying renewable energy facilities. Via official tracking systems such as the NARR, which ensure that RECs can't be double-counted, RECs are traceable and allow for accurate tracking of the source, vintage, and ownership of renewable electric generation. By retiring a REC, only its owner can make the legitimate claim to being "green" or to being x% renewable. By selling a REC, the environmental attributes can be transferred to another entity in exchange for revenue so that the buyer can meet a voluntary standard or comply with an RPS." KMEA will gladly make available to the PUCO a copy of the REC Directive form, if needed, with the understanding it not be made public in this case docket.

Additionally, there are a couple of items currently reflected in the Application that we would like to clarify.

- In Part C "Regulatory/Emergency Contact", the title for John Seck should read "Director Resource Planning and Development"
- In Part D "Facility Resource Information", "205mw" should be replace with "200.48 MW"

Please let us know if we can provide further clarification to the questions above or if you have any additional questions. Again, thanks for your help with the application process.

Regards,
John



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From: stuart.siegfried@puco.ohio.gov [mailto:stuart.siegfried@puco.ohio.gov]
Sent: Monday, March 8, 2021 9:47 AM
To: John Seck
Cc: Kristin.Clingan@puco.ohio.gov; David Lamis
Subject: OH REN Application: Buckeye Wind Energy Center

Good morning John,

I am in the process of reviewing the certification application for the **Buckeye Wind Energy Center**,

which is the subject of [case no. 21-0163-EL-REN](#). At this stage in my review, I have a few questions (see below). I would ask that you please either (1) e-file your responses in the 21-0163-EL-REN docket, or (2) email the responses to me along with a request for Staff to e-file them in this docket on your behalf. Please note that this is a public case docket.

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Thank you,

Stuart M. Siegfried

Public Utilities Commission of Ohio

Rates & Analysis Department

Efficiency & Renewables Section

Environmental Specialist

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in

Case No(s). 21-0163-EL-REN

Summary: Correspondence Responses to Staff DR Set 1 electronically filed by Mr. Stuart M Siegfried on behalf of Applicant