

CSG
Exhibit
1

INTERROGATORIES

- Inter No. 2.** For each Applicant Facility, for each calendar year, commencing with the year the facility was placed into service through 2021, Identify:
- a) Purchase Power Agreements for the sale of energy or capacity associated with the facility;
 - b) The NERC e-Tag associated with the facility;
 - c) The total MWh generated by the facility;
 - d) The MWh assigned NERC e-tags for electricity delivered into PJM;
 - e) The MWh assigned NERC e-tags for electricity delivered into Ohio;
 - f) The MWh sold in the real time markets or day-ahead markets administered, as applicable, by PJM and MISO.
 - g) Any Auction Revenue Rights or Financial Transmission Rights secured from PJM or MISO (capitalized terms are as defined in the PJM and MISO tariffs).
 - h) Any rights to Point to Point Transmission Service (both Firm and Non-Firm) within or between PJM or MISO.
 - i) The methodology, and workpapers where applicable, with formulae intact, used to calculate the values provided in response to a. – c. above.

RESPONSE: Objection. See General Objections. Specifically, Applicants object to this interrogatory to the extent it inquires into matters that are not relevant to the subject matter of the proceeding and are not “reasonably calculated to lead to the discovery of admissible evidence.” See General Objection Nos. 1, 4, 7 and 8 and Ohio Adm.Code 4901-1-16(B). Applicants also object to the extent that CSG is inquiring into any information exempt from discovery under the trial preparation doctrine, work product doctrine, and/or the attorney client privilege. See General Objection No. 2. Applicants further object to the extent the inquiry seeks information that is publicly available or already within CSG’s knowledge, possession, custody, or control, or information that CSG can easily obtain. See General Objection No. 6. Applicants also object to this interrogatory to the extent it seeks the production or disclosure of competitively sensitive information, proprietary business information, or trade secrets. See General Objection No. 11.

Subject to, and without waiver of, their objections, Applicants state as follows:

- a) The purchase power agreements for each facility constitute competitively sensitive information, proprietary business information, or trade secrets and are protected from disclosure. See General Objection No. 11.
- b) The NERC e-tag associated with each facility constitutes competitively sensitive information, proprietary business information, or trade secrets and is protected from disclosure. See General Objection No. 11.
- c) The total MWh generated by each facility constitutes competitively sensitive information, proprietary business information, or trade secrets and is protected from disclosure. See General Objection No. 11.
- d) This information is not part of the Commission's deliverability evaluation and not relevant to the applicable standards. As such, it is not relevant and not "reasonably calculated to lead to the discovery of admissible evidence." See Ohio Adm.Code 4901-1-16(B). However, none of the facilities have NERC e-tags for PJM.
- e) This information is not part of the Commission's deliverability evaluation and not relevant to the applicable standards. As such, it is not relevant and not "reasonably calculated to lead to the discovery of admissible evidence." See Ohio Adm.Code 4901-1-16(B). However, none of the facilities have NERC e-tags for Ohio.
- f) Because the amount of MWh sold in the real time markets or day-ahead markets, if any, could be used to determine the total MWh generated by each facility, this information for each facility constitutes competitively sensitive information, proprietary business information, or trade secrets and is protected from disclosure.
- g) This information is not part of the Commission's deliverability evaluation and not relevant to the applicable standards. As such, it is not relevant and not "reasonably calculated to lead to the discovery of admissible evidence." See Ohio Adm.Code 4901-1-16(B). However, none of the facilities have Auction Revenue Rights or Financial Transmission Rights from PJM or MISO.
- h) This information is not part of the Commission's deliverability evaluation and not relevant to the applicable standards. As such, it is not relevant and not "reasonably calculated to lead to the discovery of admissible evidence." See Ohio Adm.Code 4901-1-16(B). However, none of the facilities have Point to Point Transmission for PJM or MISO.
- i) See responses to Inter. No. 2(a) – (c).

PREPARED BY: Counsel for Applicants.

SUPPLEMENTAL RESPONSE (Sept. 15, 2022): Subject to, and without waiver of, the previously asserted objections set forth above, Applicants state as follows:

- a) The Moraine, Elm Creek II, and Buffalo Ridge II Facilities have no associated purchase power agreements. Moreover, the portion of the Rugby Facility for which the Applicants are seeking REN certification has no purchase power agreements. The Barton Windpower I Facility has entered into purchase power agreements for the Facility.
- b) None of the Facilities have NERC e-tags.
- c) Upon information and belief, and upon further review, Applicants have become aware that the total annual MWh in net generation output for each Facility is maintained by the United States Energy Information Administration and is available on Form EIA-923, Schedule 3A, located at <https://www.eia.gov/electricity/data/eia923/>.
- d) See supplemental response to Interrogatory 2(b) above.
- e) See supplemental response to Interrogatory 2(b) above.
- f) The exact amount of MWhs sold in the real time markets or day-ahead markets on an hourly basis is competitively sensitive information, proprietary business information, and/or constitutes trade secrets.
- i) See supplemental responses to Interrogatory Nos. 2(a), (b), (c), and (f) above.

VERIFIED BY: /s/ Peter Landoni

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**Case No(s). 21-0516-EL-REN, 21-0517-EL-REN, 21-0531-EL-REN, 21-0532-EL-
REN, 21-0544-EL-REN, 22-0380-EL-REN**

Summary: Exhibit CSG Exhibit 1 electronically filed by Mr. Ken Spencer on behalf
of Armstrong & Okey, Inc. and Gibson, Karen Sue Mrs.