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Sent: Tuesday, March 07, 2017 10:13 AM
To: Prabhu, Anil@ARB
Cc: Dickman, Christopher
Subject: POET - Electricity

Anil,

You asked us to send you an email to discuss any future ideas or processes. We would like to discuss non-co-located electricity generation.

For each 1000 KWH of wind generated electricity a tag is created, utilities or generators turn these tags in in order to make sure they are meeting specific state requirements for renewable generation. Excess tags are available for RECs.

In the staff summary "Electricity as a Transportation Fuel" dated 11-23-16, specific requirements were put in place for EV charging stations with non-co-located generation, we have also added our comments on why we think we also meet these requirements:

On page 4 of this paper, under the heading of "Consideration of Flexibility for Non-co-located Renewable Power"

- (1) Is obtained through a program with eligibility requirements, that match or more stringent than the GTSR program.
 - a. In the Midwest we use a similar program call "Midwest Renewable Tracking System", in this system a 3rd party verifies and assigned REC to edible and validated, for every 1000 kwh produced a REC tag is created. These tags are eligible for Green-e certification as well.
- (2) Meets all the following requirements:

- a. Generated on Land owned by the charging station owner and located within the same EDU territory.
 - i. As a partial owner of the Co-op owned wind farm, the wind farm is owned by the ethanol plant.
- b. Generation is developed specifically for supplying stations demand.
 - i. The wind generation would be/could be dedicated to our facility and validated with specific metering (contractually, verifiable and metered).
 - ii. While this wind farm was not initially dedicated to our facility, the future dedication would insure maximum uptime and building more.
- c. Meets the renewable eligibility requirement in the RPS guidebook.
 - i. Reviewed the guidebook, dated 3-16-16.
 - ii. All wind generation facilities are eligible for RPS, minus certification and approval by RPS there are no specific wind requirements.
- d. Does not produce RECs for any other program then for LCFS.
 - i. Agreed and verified using Green-e verification and/or Midwest Renewable tracking system.

What are your thoughts on pursuing this as an option for POET?

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Plant Manager

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