

STATE OF ALABAMA PUBLIC SERVICE COMMISSION P.O. BOX 304260 MONTGOMERY, ALABAMA 36130

TWINKLE ANDRESS CAVANAUGH, PRESIDENT JEREMY H. ODEN, ASSOCIATE COMMISSIONER CHRIS "CHIP" BEEKER, JR., ASSOCIATE COMMISSIONER

ALABAMA POWER COMPANY,

Petitioner

PETITION: For a certificate of convenience and necessity for the construction or acquisition of renewable energy and environmentally specialized generating resources and the acquisition of rights and the assumption of payment obligations under power purchase arrangements pertaining to renewable energy and environmentally specialized generating resources, together with all transmission facilities, fuel supply and transportation arrangements, appliances, appurtenances, equipment, acquisitions and commitments necessary for or incident thereto.

Docket No. 32382

ORDER

BY THE COMMISSION:

I. <u>INTRODUCTION</u>

Alabama Power Company ("Alabama Power" or "Company"), acting in accordance with the provisions of section 37-4-28, *Code of Alabama* (1975), has filed with the Commission a petition for a certificate of convenience and necessity, by which it would be authorized to develop or procure up to 500 megawatts of capacity and energy from renewable energy and environmentally

JOHN A. GARNER, EXECUTIVE DIRECTOR

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specialized generating resources ("Petition"). The Petition has been properly noticed, and an evidentiary hearing has been held, at which the Company supported its request. On the basis of the record and information collected by the Staff, the Commission concludes that the Company's Petition should be granted, subject to the conditions set forth below.

II. PROCEDURAL BACKGROUND

The Company filed its Petition with the Commission on June 25, 2015. A copy of the Petition subsequently was made available to the public through the Commission's website on or about June 26. A Notice of Petition was issued by the Commission on July 14, advising interested parties that any petitions to intervene should be submitted no later than July 29. The Notice further advised that a public hearing in the matter had been scheduled for August 12. Timely notices of intervention were tendered by Alabama Environmental Council ("AEC"), Alabama Industrial Energy Consumers ("AIEC"), Alabama Property Rights Council, LLC ("APRC"), the Attorney General for the State of Alabama ("Attorney General"), Gulf States Renewable Energy Industries Association ("GSREIA"), JobKeeper Alliance ("JobKeeper"), and the Southern Alliance for Clean Energy ("SACE"). On August 3, Alabama Power submitted an objection to the petitions to intervene of APRC, GSREIA and SACE.

On August 4, the Commission entered an order granting the petitions to intervene of AEC, AIEC, Attorney General and JobKeeper. In the order, the Commission stated that the petitions to intervene of APRC, GSREIA and SACE remained under consideration, and that any response from these entities to Alabama Power's objection was due by August 6. The Commission further directed all parties intending to present testimony at the hearing to file a notice of same with the Commission Secretary by August 7, identifying the witnesses and providing a short summary of the expected testimony. On August 6, GSREIA and SACE responded to the Company's objection. On

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August 7, Alabama Power filed a response to GSREIA and SACE, withdrawing its objection as to their petitions to intervene. Alabama Power also filed a notice by which it identified its witness, Noel Cain, Regulatory Policy Manager for Alabama Power Company, and provided a summary of her testimony. Additional notices were filed on behalf of GSREIA and AEC. GSREIA's notice indicated that testimony would be presented by its president Jeff Cantin. By its notice, AEC stated that it did not intend to offer testimony in the proceeding.

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A hearing in the proceeding was held as scheduled on August 12. At the outset of the hearing, full party status was granted to GSREIA and SACE. The petition to intervene of APRC was denied. Thereafter, Ms. Cain appeared as a witness and provided testimony in support of the Company's Petition. Among other things, she discussed the scope of the requested certificate and the proposed conditions that would apply to its exercise. She testified as to the types of projects that would be eligible under the requested certificate, subject to their satisfaction of specific qualifying criteria. Ms. Cain also explained the drivers prompting the requested certificate and the benefits for all customers that could be derived from authorization of such projects.

Representatives of the Commission Staff then asked Ms. Cain a number of clarifying questions. Next, counsel and representatives for the Attorney General, AIEC, JobKeeper, AEC, SACE and GSREIA were given an opportunity to conduct cross-examination. The Company followed with brief redirect, and the examination of Ms. Cain closed with the Attorney General and Commission Staff posing final questions. Following the completion of Ms. Cain's testimony, Mr. Cantin for GSREIA elected not to present testimony. No other party requested an opportunity to present testimony. Thereafter, on August 20, AEC and GSREIA submitted post-hearing briefs in accordance with a schedule established at the hearing. Alabama Power responded to those briefs on August 24.

III. **DISCUSSION**

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In accordance with section 37-1-49, *Code of Alabama* (1975), Alabama Power possesses the responsibility to render adequate service to the public and make reasonable improvements, extensions and expansions of its facilities to meet the growth and demand of the territory under which it holds a duty to serve. To meet this responsibility, Alabama Power has historically sought a certificate of convenience and necessity for additional generating capacity deemed necessary to reliably serve its customers. In recent years, however, Alabama Power has requested authorization, in the form of a certificate of convenience and necessity, for certain renewable energy-based power purchase agreements ("PPAs") that were not secured for the purpose of addressing reliability needs. Rather, authorization for these PPAs was sought based on the expectation that the identified costs of the PPAs, relative to the Company's projected avoided costs, would result in economic benefits for all customers. This conclusion justified the Company's decision to execute these PPAs and the Commission's subsequent certification of them. Moreover, the rights secured under these agreements enhanced the reliability of the electric system, even though such resources were not added as a result of the Company's reliability-based planning process.

Alabama Power's Petition for a certificate of convenience and necessity currently before the Commission is unique in the sense that the goals underlying it involve customer interest in renewable energy rather than reliability of the electric system. Nonetheless, the Petition reflects an appropriate exercise by Alabama Power of its statutory duty to serve, in that projects authorized under the certificate are expected to provide economic benefits to all customers.

As stated at the outset, the Petition seeks authorization to develop or procure up to 500 megawatts of capacity and energy from renewable energy and environmentally specialized generating resources. Individual projects under this certificate could not exceed 80 megawatts (measured in terms of alternating current, or AC). A renewable energy resource would include

those types of resources identified in section 40-18-1(30), *Code of Alabama* (1975). An environmentally specialized generating resource would be a resource that promotes environmental or other efficiencies, such as combined heat and power. A project could be a "self-build" project, acquisition of a renewable resource or a PPA.

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The Company presents no specific project or projects for authorization at this time. Rather, once a project has been identified, the Company proposes to provide the Commission Staff and the Attorney General with information, analyses and data sufficient for them to evaluate whether a project satisfies specific eligibility criteria. Those criteria fall into two categories: (i) project qualifying criteria, and (ii) economic benefits criteria. The former includes the characteristics previously described, namely that: a qualifying resource must be a renewable energy or environmentally specialized generating resource; no single project can exceed 80 megawatts; and the capacity of the project cannot result in the 500 megawatt limit being exceeded.

The latter criteria pertains to the requirement that a proposed project is expected to result in a positive economic benefit for all customers. To evaluate whether a project satisfies this requirement, the Commission Staff will review the expected cost of the project relative to the Company's projected avoided costs over the term of the project, as well as other project-specific benefits.¹ Such benefits could include: (i) the extent to which the project is expected to facilitate load growth or load retention (which would be expected to place downward pressure on all rates); (ii) the extent to which the project contributes to the Company's ability to comply with environmental or other governmental mandates; and (iii) the extent to which the project includes a customer-specific contribution, either for a specified period or for the term of the project. Within thirty (30) days of the project's submission for review, the Commission Staff will report to the

¹ For purposes of evaluating a project against the requisite criteria, the "term" of a self-build project or acquisition will be estimated using prevailing industry standards or, if applicable, contractual agreements (e.g. right-of-way agreement). For power purchase arrangements, the term would be that set forth in the agreement. In either case, the project will be evaluated over the term designated during the review process.

Commission as to whether the project satisfies the proposed criteria. Under the Petition, the Commission would vote to disapprove any project not satisfying the criteria. Otherwise, the project will be deemed to have qualified under the certificate and be authorized for its useful life or the term of the PPA, as applicable². After six (6) years from the date of the Commission's order, if any of the authorized 500 megawatts has not been exercised, the certificate authorization for that unexercised capacity will expire. ³

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In its Petition and at the hearing, Alabama Power explained that the principal reason for the requested certificate is interest in renewable energy resources by customers representing significant load on its system, including military bases operating in the Company's territory. Ms. Cain testified that the military's interest arises out of federal requirements set forth in the John Warner National Defense Authorization Act for Fiscal Year 2007, Public Law 109-364, which established a goal for the Department of Defense that it produce or procure not less than 25 percent of the total quantity of electric energy it consumes within its facilities and in its activities during 2025 and each year thereafter from renewable energy resources. More recently, by Executive Order dated March 19, 2015, President Barack Obama set additional goals for all federal agencies by requiring, among other things, that of the total amount of building electric energy consumed by a given agency, not less than 10 percent shall be renewable energy by fiscal year 2016. These drivers have resulted in military installations across the Southeast establishing renewable energy projects, including bases in Georgia, Florida, Mississippi and the Carolinas, and are prompting bases in Alabama to undertake the same.

 $^{^{2}}$ In this respect, the "useful life" of the project or the contractual term of the PPA is equivalent to the "term of the project". Accordingly, a project presented under the certificate that meets the requisite criteria would be certificated for the designated "term of the project".

³ For an eligible project, the beginning of the construction of the road, site-preparation, interconnection facilities, system facilities or, a signed contract in the case of a power purchase arrangement, would constitute exercise of the certificate authority. Section 37-4-29 *Code of Alabama*, 1975, provides guidance as to what constitutes exercise of a certificate.

Customer interest is not confined to the military and other federal agencies, however, as larger customers in the private sector also are expressing a desire for renewable energy options. Ms. Cain testified that nearly half of the nation's Fortune 500 companies have set renewable goals or mandates for themselves. For many companies, the ability to partner with a local utility to secure energy supply from renewable resources is an important factor for that company in determining whether it wishes to expand or site new facilities in a given state. Ms. Cain provided several examples of company siting decisions influenced in whole or in part by renewable energy supply or the future option for such supply, including decisions near and in Alabama.

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This nexus to customers not only drives the scope of the Company's Petition, but also its proposed evaluation process. Specifically, the Company proposes that the information, analyses and data supporting individual projects be submitted for review directly to Commission Staff and the Attorney General, as opposed to being filed and subject to additional formal proceedings. In this way, all proprietary and confidential information, including that of the associated customer or customers, can be handled appropriately once in the custody of Commission Staff and the Attorney General. The proposed structure fulfills an expectation of customers that their information will be closely held, while at the same time enhancing the ability of the Company to act quickly on particular projects, an ability of significant and immediate value given that federal investment tax credits for solar generation are set to be dramatically reduced at the end of 2016.⁴

In its Petition, the Company states that its proposal stands to provide a number of benefits to customers. With respect to the military, the ability of the Company to work with the individual installations to provide renewable energy solutions should help them avoid unwarranted scrutiny by federal leaders. Lieutenant Governor Kay Ivey, as Chair of the Alabama Job Creation and Military

⁴ A number of changes to this credit are scheduled to take effect for systems placed in service after December 31, 2016. The credit for equipment that uses solar energy to generate electricity, to heat or cool (or provide hot water for use in) a structure, or to provide solar process heat will decrease from 30% to 10% (absent Congressional action). http://energy.gov/savings/business-energy-investment-tax-credit-itc

Stability Commission, echoed this point in her June 30, 2015 letter to the Commission. In that letter, she stressed the importance of the military installations to the Alabama economy, and particularly the state's residents whose jobs depend on military operations. As for private sector opportunities, the proposal serves as a potential means by which new load can be attracted to the state and, in some cases, existing load preserved.

The Company's Petition also states that further benefits may be realized through application of a project for environmental compliance purposes. As an example, the Company mentioned the new Clean Power Plan rule from the Environmental Protection Agency. Although much uncertainty remains regarding the implementation of that rule at the state level, the Company observed that projects under the proposal ultimately could assist with compliance, which would provide additional benefits for customers. Another example given by the Company was the ability of renewable generation to offset the use of other generation, which could assist the Company in its compliance with currently applicable emissions limits.

In post-hearing briefs, AEC and GSREIA generally support Alabama Power's Petition, but do call for additional procedures. AEC urges the Commission to employ the procedural requirements adopted for purposes of Docket No. 31301, so that the same avenues for additional public participation and access to project-specific information are available for projects under the Petition here. AEC and GRSEIA also request that formal bidding processes be utilized for projects, stating that the Request for Proposal ("RFP") Guidelines included in the aforementioned docket likewise be applied to any project that the Company would submit for qualification under this certificate. In response, Alabama Power states that the procedural requirements adopted in Docket No. 31301 were a function of the circumstances underlying that proceeding, which are unlike those present here. Among other things, Alabama Power observes that the petition in Docket No. 31301 received opposition from both the Attorney General and AIEC, whereas no such opposition has been lodged here by any party. Alabama Power further notes that AEC and GRSEIA did not offer testimony in this proceeding, which leaves the record devoid of any evidence to support the validity or appropriateness of their recommendations. Regarding an RFP process, Alabama Power states that it intends to utilize such a process where appropriate and without prejudice to its ability to identify projects through other means. The Company also clarifies that it intends to issue RFPs on a biennial basis, beginning in 2016.

In summary, the Company views the proposed certificate and the projects contemplated under it as being consistent with the public interest in that such projects are expected to provide positive economic benefits to all customers. According to Ms. Cain, the proposal is a "smart way forward" that allows the Company to respond to customer interest in renewable generation, but in a manner designed to avoid subsidies across customers or cost shifts to customers who do not place a priority on renewable generation. The Company thus requests that its Petition be approved and the certificate issued as requested.

IV. FINDINGS AND CONCLUSIONS

After full consideration of the evidence presented and information made available to it, the Commission **FINDS** that the proposed certificate of convenience and necessity should be granted and that the public interest will be served by issuance of the requested authority.

Under section 37-4-28, *Code of Alabama* (1975), the Commission is authorized as part of the issuance of a certificate of convenience and necessity to "prescribe such conditions on the issuance as it may deem advisable." The Company has proposed a number of conditions for this certificate, including a process by which Commission Staff and the Attorney General can review proposed projects to evaluate their satisfaction of applicable eligibility criteria, the timing for such review, and the action to be taken by the Commission upon completion of the review.

Based on the record before it, the Commission **FINDS** these conditions to be just and reasonable, subject to the modifications and additional conditions discussed more specifically in the findings below.

First, the Commission **FINDS** that the issuance of a generic Request for Proposal, on a biennial basis, beginning in 2016, for projects submitted under Docket No. 32382, is a reasonable condition. In this respect, the Commission adopts the Staff's recommended Request for Proposal Guidelines, which are consistent with guidelines previously authorized by the Commission and appended to this Order as Appendix One (1) for use in connection with this certificate. The Commission **FURTHER FINDS** that every project does not have to arise from an RFP. In this regard, the Commission agrees that market information and project opportunities can be identified through other means, such as unsolicited offers. By allowing such flexibility, the Commission will not foreclose the Company's ability to act on available market information coming to it from sources other than an RFP.

Second, Commission Staff has recommended that the Commission adopt Minimum Informational Requirements. The required information will be provided to the Staff and the Attorney General concurrent with the submission of a project for approval under Docket No. 32382. Commission Staff and the Attorney General will have the authority to request any other information from the Company regarding a proposed project that they believe will reasonably assist with their respective reviews. Therefore, the Commission **FINDS** that the inclusion of Minimum Informational Requirements for the submission of a proposed project under this docket will facilitate the Commission Staff's review of a proposed project's eligibility. Those requirements are appended to this Order as Appendix Two (2).

Third, the Commission **FINDS** that no more than 160 MW can be submitted and approved under the 500 MW certificate authority in any given calendar year. This limitation will serve as a means to diversify the renewable projects, submitted under this docket, in terms of reliance on any particular set of data (i.e. economic and market related data). The Commission views this guideline in tandem with the use of RFPs described above, in that it represents an administratively reasonable means to balance the Company's reliance on selected market information, while also taking into account the changing cost of renewable resources. Alabama Power may seek an exception to this limitation by way of a written request to the Commission. Such request will be deemed approved unless the Commission notifies the Company, no later than forty-five (45) days following the Company's submission of its written request, that such request is disapproved.

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Fourth, the Commission **FINDS** that each project shall be approved or disapproved by a majority vote of the Commission. This condition will also serve as a means to inform the public as to progress under the certificate.

Lastly, the Commission **FINDS** that, in its approval of this certificate, it does not relinquish any of its authority to review such renewable projects, where appropriate and without prejudice, through other means as it deems necessary under the circumstances.

The Commission **FURTHER FINDS** that it is not persuaded to include other conditions beyond those discussed above. This proceeding, unlike that in Docket No. 31301, reflects wideranging support for the Company's petition. Moreover, the evidence in the record more than adequately supports the need for precautions such as those proposed, in order to safeguard sensitive information. Finally, the Attorney General, as the statutory representative of the using and consuming public, will have adequate opportunity to evaluate projects submitted under this docket and represent any remaining interest the public possesses in the implementation of the certificate authorized herein. In sum, the totality of the circumstances before the Commission instructs its judgment as to what conditions are advisable, so that the authority granted the Company through this certificate is just and reasonable and in the public interest.

IT IS, THEREFORE, ORDERED BY THE COMMISSION that the June 25, 2015

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> Petition of Alabama Power be and hereby is granted, as described in the body of this Order, including the aforementioned conditions. The Commission FURTHER ORDERS that, respecting each project subsequently submitted and approved under this certificate authority, such projects are authorized for the term of each project. Given the unique nature of this petition and the specified approval process for the projects submitted thereunder, the Commission FURTHER ORDERS that any request to extend a specific project beyond its original term shall be subject to the approval process set-forth in this docket.

> IT IS FURTHER ORDERED BY THE COMMISSION that with the issuance of this certificate of convenience and necessity to Alabama Power, the Commission does hereby grant and convey upon Petitioner, Alabama Power Company, its successors and assigns, all of the rights, power and authority which, under the laws of the State of Alabama, the Commission is authorized to confer for the purpose of the construction or acquisition of renewable energy and environmentally specialized generating resources and the acquisition of rights and the assumption of payment obligations under power purchase arrangements pertaining to renewable energy and environmentally specialized generating resources, together with all transmission facilities, fuel supply and transportation arrangements, or other appliances, appurtenances and commitments necessary for or incident thereto.

IT IS FURTHER ORDERED BY THE COMMISSION that jurisdiction is retained over this matter to make such further orders as deemed necessary or appropriate under the circumstances, including the authority, where appropriate and without prejudice, to review such renewable projects through other means as it deems necessary.

IT IS FURTHER ORDERED BY THE COMMISSION that this Order shall be effective as of the date hereof.

DONE at Montgomery, Alabama, this 16 day of, September, 2015.

ALABAMA PUBLIC SERVICE COMMISSION

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Twinkle Andress Cavanaugh, President

Jeremy H. Oden, Commissioner

Chris "Chip" Beeker, Jr., Commissioner

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Request for Proposal (RFP) Guidelines for Alabama Power Company

While a formal and mandatory bidding process is not required under Alabama law, these written guidelines have been developed to give potential bidders an overview of the entire process and provide assurance that this process, including its use in connection with the solicitation of bids and proposals for renewable energy and environmentally specialized generating resources, continues to be conducted in a systematic, orderly and fair manner.

As these guidelines provide, the Company retains the flexibility to take advantage of extraordinary opportunities on a case-specific basis. Likewise, these guidelines are not intended to prohibit the Company from reviewing unsolicited proposals. In addition, the Company retains the right to revise the guidelines in response to changing conditions.

- 1. Except as otherwise provide herein, the Company will issue an RFP to determine the availability of renewable energy alternatives and their possible cost advantages. The RFP may address generating capacity needs for multiple years.
- 2. The RFP process reflected herein is intended to govern solicitations by the Company for projects that may qualify for the certificate of convenience and necessity for renewable energy and environmentally specialized generating resources. Nonetheless, the Company retains the right to certificate new generating capacity outside of this RFP process in order to maintain system reliability, to take advantage of extraordinary opportunities (including co-generation projects), to react to unsolicited offerings, and to respond to unusual circumstances.
- 3. The RFP will include (at a minimum) the following:
 - a) Amount (or range) of capacity or energy
 - b) Required in-service dates(s)
 - c) Term of Contract
 - d) Solicitation Schedule
 - e) Description of screening criteria
 - f) Transmission requirements
 - g) Bid forms and instructions
- 4. A Notice of Intent to Bid may be required.
- 5. An administrative and/or evaluation charge, as determined with Alabama Public Service Commission (Commission) oversight, will be required for each RFP bid/proposal (or options contained therein).

- Timely notification of the RFP issuance will be made through public notices in major newspapers, periodicals and/or trade publications. The Company also will post notice of the RFP on its website.
- 7. A copy of the RFP will be provided to the Commission contemporaneously with the dissemination of notice to the public
- 8. The RFP will specify a deadline for the submission of all proposals in response to the RFP. All such proposals (including any submitted by the Company and/or its affiliates) will be opened simultaneously in the presence of a representative of the Commission and, at the Company's option, an independent third party (e.g., and accounting firm).
- 9. The Company will communicate to the Commission the complete list of bidders, the short list of bidders after the initial evaluation, and the elimination process, with appropriate measures employed to protect all confidential and proprietary information of the Company and bidders.
- 10. The Company will evaluate all bids/proposals and select the bid/proposal that will provide reliable service at the lowest total cost, with due regard for other relevant considerations. In the event an affiliate of the Company submits a proposal in response to the RFP, the Company will meet with the Commission Staff in advance of any evaluation to review the need for any additional evaluation parameters.
- 11. If required, the Company will file a petition with the Commission to certify the resource selected through the above-described process.

Alabama Public Service Commission Minimum Informational Requirements

Re: Docket 32382 Alabama Power Company's Renewable Generation Certificate 500 MW of Renewable Energy and Environmentally Specialized Generation Resources

Confidentiality Requirements

The Informational Requirements set forth below require the production of research, development, models, projections, data and other information that may be of a confidential, proprietary and commercially sensitive nature, and which if publicly disclosed, would materially and adversely affect the Company and its customers, including any customers directly involved in a particular project. Accordingly, members of Commission Staff and the Office of the Attorney General that access this information are expected to treat all information that is labeled "Confidential" as non-public and confidential and afford it such protections as it would afford its own and other non-public and confidential information in its custody, consistent with the applicable provisions of Alabama law.

Review Procedure Requirements

- Required data should reflect the same cost and other information that the Company relied upon to evaluate the subject project and to determine the suitability of the project for execution. All information and data should be current and well-supported. Any data that is known to be outdated should be updated where practical.
- 2. Company personnel shall make a presentation to the Commission Staff and the Office of the Attorney General regarding any individual project submitted under the certificate and the information contained in the Minimum Informational Requirements. The Company shall be prepared to answer questions on same and provide follow-up responses as necessary. The Company's presentation should be made concurrent with the submission of any project under the referenced certificate authority.

Informational Requirements (as applicable)

Included with each project submission the Company will be required to provide at a minimum the following applicable information to the Commission Staff and the Office of the Attorney General.

- 3. Documentation in Support of Avoided Cost Projections Associated with Submitted Projects
 - a. Data tables and/or charts demonstrating "Total Avoided Costs", including separate data tables demonstrating: (a) Avoided Capacity Costs; (b) Avoided Energy Costs; and (c) Other Project-related Components.

- b. Information on "Total Avoided Capacity Costs" with references and/or source documents for estimated market values of avoided capacity costs.
- c. Information on "Total Avoided Energy Costs" with adequate project-specific sensitivities included in the projected fuel budgets for each year under review.
- d. Data tables and/or charts demonstrating the coal price estimates included in the Company's annual energy budgets, for each year under review, together with documentation supporting such estimates. Also provide comparisons to other industry forecast if available.
- e. Data tables and/or charts demonstrating the natural gas price forecast included in the Company's annual energy budgets, for each year under review, together with documentation supporting such estimates. Also provide comparisons to other industry forecast if available.
- f. Data tables and/or charts demonstrating the hydro generation included in the Company's annual energy budgets, for each year under review, together with documentation supporting such estimates.
- g. Data tables and/or charts demonstrating the emissions cost forecast included in the Company's annual energy budgets, for each year under review, together with documentation supporting such estimates.
- h. Data tables and/or charts demonstrating a comparison of historical and projected avoided energy costs.
- 4. Documentation in Support of Qualifying Projects
 - a. A description of the project, including but not limited to: location, customer nexus information, MW size of project, type of renewable or environmentally specialized resource, term of project, and project costs.
 - b. Data tables and/or charts demonstrating project costs, including but not limited to: (if Company-owned asset)
 - i. Estimate of total installed cost represented in total dollars and dollars per KW and documentation supporting such estimates.
 - ii. Estimate of annual operation and maintenance costs, by year, and documentation supporting such estimates.
 - iii. Estimate, description, and explanation of project interconnection agreements, and project interconnection costs together with documentation supporting such estimates.
 - iv. Estimate, description, and explanation of related project integration costs, including documentation to support such estimates.
 - v. Estimate, description, and explanation of any applicable project tax credits, inclusion of tax credits in project evaluation and documentation supporting any estimates.
 - vi. Estimate, description, and explanation of any applicable renewable energy credits associated with each project, inclusion of such credits in the project evaluation, and documentation to support any estimated value of such credits.

- vii. A description of any other costs associated with the renewable energy project and documentation supporting such estimates.
- viii. Information on any other contractual agreements associated with the submitted project.
- c. Data, tables and charts demonstrating project costs, including but not limited to: (if Power Purchase Arrangement)
 - i. Estimate of PPA costs, by component, represented in total dollars and dollars per unit of measure, for each year under review, together with documentation supporting such estimates.
 - ii. .Estimate, description, and explanation of any PPA interconnection agreements, any Alabama Power expected project interconnection costs, and documentation supporting such estimates.
 - iii. Estimate, description, and explanation of related project integration costs, including documentation to support such estimates.
 - iv. Estimate, description, and explanation of any applicable Alabama Power projectspecific tax credits and documentation to support such estimates.
 - v. Estimate, description, and explanation of any applicable renewable energy credits associated with each project, inclusion of such credits in the project evaluation, and documentation to support any estimated value of such credits.
 - vi. A description of any other costs associated with the renewable energy PPA and documentation supporting such estimates.
 - vii. Information on any other contractual agreements associated with the submitted project.
- 5. Documentation in Support of any Expected Other Project-Specific Positive Economic Benefits
 - a. Written descriptions of any "other positive benefits" included in the evaluation of the submitted project
 - a. Estimated load growth or load retention benefits and documentation supporting such estimates.
 - b. Estimated environmental or other governmental mandates compliance benefits, not otherwise captured in the avoided cost benefits, derived from the submitted project and documentation supporting such estimates.
 - c. Information on any estimated customer-specific contributions related to the submitted project and documentation supporting such estimates.
- 6. Other data and information that Staff or the Office of the Attorney General deems reasonably necessary to evaluate the submitted project and its satisfaction of the applicable criteria, and to make a recommendation to the Commission