

# Memorandum

To: Commissioners Brian Kroshus, Julie Fedorchak, and Randy Christmann  
From: Adam Renfandt  
Date: December 5, 2019  
Subject: Ashtabula Wind I, LLC Decommissioning Financial Assurance

Case No. PU-10-103

On June 27, 2018, the Commission approved Ashtabula Wind, LLC's revised decommissioning plan and cost estimate. The facility has a nameplate capacity of 148.5 MWs and consists of 99 turbines. The cost estimate that was approved was \$12.375 million.

On August 29, 2019, Ashtabula Wind, LLC filed with the Commission a parent guarantee in the amount of \$12.375 million for decommissioning the facility with NextEra Energy Capital Holdings, Inc. as the guarantor and with Ashtabula Wind, LLC as the owner/obligor.

On October 8, 2019, Ashtabula Wind, LLC and Ashtabula Wind I, LLC filed a Joint Application for Expedited Transfer of the First Reissued First Amended Certificate of Site Compatibility No. 7 from Ashtabula Wind, LLC to Ashtabula Wind I, LLC in Case No. PU-19-336. The transfer was to facilitate a tax equity financing associated with the repowering of the facility. A new project company needed to be established to hold the existing assets with the addition of the new, repowered equipment.

On October 24, 2019, Ashtabula Wind I, LLC filed a parent guarantee in the amount of \$12.375 million in order to reflect the proposed Joint Application for Expedited Transfer of the First Reissued First Amended Certificate of Site Compatibility No. 7 from Ashtabula Wind, LLC to Ashtabula Wind I, LLC. Legal has signed off on this parent guarantee filed on October 24, 2019.

Staff recommends the following contingent on whether the Commission approves the transfer of Ashtabula Wind, LLC Certificate of Site Compatibility to Ashtabula Wind I, LLC:

1. Staff recommends the Commission acknowledge the withdrawal of the parent guarantee filed on August 29, 2019, by Ashtabula Wind, LLC.
2. Staff recommends the Commission approve the parent guarantee filed on October 24, 2019, by Ashtabula Wind I, LLC