

Legal Department

April 15, 2010

Ms. Renee J. Jenkins
Secretary of the Commission
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Steven T. Nourse
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RE: *In the Matter of the Annual Alternative Energy Status & Compliance Report Under Rule 4901:1-40-05, Ohio Administrative Code, for Columbus Southern Power Company, Case No. 10-486-EL-ACP*

Dear Ms. Jenkins:

I am submitting the enclosed 2009 Alternative Energy Status & Compliance Report on behalf of Columbus Southern Power Company, pursuant to Rule 4901:1-40-05, Ohio Administrative Code.

Thank you for your attention to this matter.

Respectfully Submitted,

/s/ Steven T. Nourse
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Annual Status & Compliance Report

Introduction

In Case No. 08-888-EL-ORD, the Public Utilities Commission of Ohio (Commission) approved Rules for the Alternative Energy Portfolio Standard for electric utilities (Rules). The Rule became effective on December 10, 2009. Applying Senate Bill 221 (S.B. 221), the Rules require that each electric utility within the jurisdiction of the Commission adhere to specific advanced and renewable energy benchmark percentages. Each electric utility and electric services company is required to file an annual status and compliance report. This report is to be filed by April fifteenth of each year. Per Ohio Administrative Code (OAC) 4901:1-40-05(A), the report shall include the following items:

- The annual review will include compliance with the most recent applicable renewable- and solar-energy resource benchmark.
- The annual compliance reviews shall consider any under-compliance an electric utility or electric services company asserts is outside its control.

Columbus Southern Power Company (CSP) submits this 2009 Annual Status and Compliance Report.

CSP has achieved compliance in meeting the 2009 Benchmarks for the Ohio Alternative Energy Portfolio Standard. This was achieved through both meeting the benchmarks for the Non-Solar Renewables, as shown in Table 1, and meeting the revised benchmarks for Solar, as shown in Table 3.

Non-Solar Overview

Non-Solar achievements were met through REC purchases for the In-State Benchmark, while additional non-Solar benchmarks were achieved through a power purchase agreement with wind as the renewable energy resource and REC purchases.

Table 1: CSP Overview of Actual non-Solar MWH vs. Benchmarks

	Actual MWH	Benchmark
In-State non-Solar	24,526	>= 24,526
Additional non-Solar	24,526	n/a*
Total	49,052	49,052

** While In-State non-Solar must meet or exceed 24,256 MWH, additional non-Solar does not have a target.*

Additional details around the Non-Solar Benchmarks are shown in Exhibit 1.

Solar Overview

AEP Ohio filed *force majeure* in October of 2009, Case No 09-0987-EL-EEC, in regards to meeting the Solar Benchmarks for 2009. On January 7, 2010, the Commission ruled that AEP-Ohio had adequate reason to invoke *force majeure* and revise the 2009 SER benchmarks. Table 2 shows the original benchmarks prior to filing *force majeure*. Table 3 shows the revised benchmarks based on the approved *force majeure* filing and represents the compliance obligation for 2009.

Table 2: CSP Overview of Original Solar MWH vs. Benchmarks

	Actual MWH	Benchmark
In-State Solar	68	>= 399
Additional Solar	0	n/a*
Total	68	798

* While In-State Solar must meet or exceed 399 MWH, additional Solar does not have a target.

Table 3: CSP Overview of Revised Solar MWH vs. Benchmarks

	Actual MWH	Benchmark
In-State Solar	68	>= 68
Additional Solar	0	n/a*
Total	68	68

* While In-State Solar must meet or exceed 68 MWH, additional Solar does not have a target.

The details around the Solar Benchmarks are shown in Exhibit 1.

Conclusion

Columbus Southern Power is compliant with the 2009 Non-Solar and Solar benchmarks based on the actual RECs achieved in Non-Solar as well as the approval of the revised 2009 Solar Benchmark.

CSP 2009 Alternative Energy Resources Compliance Report

SOLAR

<u>In-State</u> Unit ID	Facility Name	Fuel Type	Month of Generation	Certificate Serial Numbers	Quantity	OH State Number
NON39410	CSP - Athens Service Center - CSP - Athens Service Center	Solar - Photovoltaic	2009/10	79723 - 1 to 59	59	09-SPV-OH-GATS-0030
NON39410	CSP - Athens Service Center - CSP - Athens Service Center	Solar - Photovoltaic	2009/12	84080 - 1 to 9	9	09-SPV-OH-GATS-0030
				Total Achieved	68	
				In-State Benchmark	399	
				In-State Balance	(331)	

<u>Additional</u> Unit ID	Facility Name	Fuel Type	Month of Generation	Certificate Serial Numbers	Quantity	OH State Number
				Total Achieved	0	
				Additional Benchmark	399	
				Additional Balance	(399)	
				*2009 Original Solar Compliance Result	(730)	
				*2009 Revised Solar Compliance Result	68	

*In Case No. 09-987-EL-EEC the Commission granted AEP Ohio's request to invoke force majeure and revise the Companies' Solar Energy Resource benchmark to 68 MWHs.

NON-SOLAR

<u>In-State</u> Unit ID	Facility Name	Fuel Type	Month of Generation	Certificate Serial Numbers	Quantity	OH State Number
NON39296	Carbon Limestone Power Station - Units 1 -14	Captured Methane - Landfill Gas	2008/08	82751 - 1874 to 4068	2,195	09-BIO-OH-GATS-0016
NON39296	Carbon Limestone Power Station - Units 1 -14	Captured Methane - Landfill Gas	2008/09	82754 - 1 to 2805	2,805	09-BIO-OH-GATS-0016
NON34271	Model LFG Power Station - GM 1 & 2	Captured Methane - Landfill Gas	2008/12	50677 - 867 to 945	79	IO-BIO-OH-GATS-0017
NON34271	Model LFG Power Station - GM 1 & 2	Captured Methane - Landfill Gas	2009/02	50764 - 1 to 741	741	IO-BIO-OH-GATS-0017
NON34271	Model LFG Power Station - GM 1 & 2	Captured Methane - Landfill Gas	2009/03	51540 - 1 to 791	791	IO-BIO-OH-GATS-0017
MSET87182101	DAY DTE BIOMASS 1 LF - 1	Captured Methane - Landfill Gas	2009/04	55404 - 1 to 1230	1,230	09-BIO-OH-GATS-0054
NON34271	Model LFG Power Station - GM 1 & 2	Captured Methane - Landfill Gas	2009/04	62397 - 1 to 904	904	IO-BIO-OH-GATS-0017
MSET87182101	DAY DTE BIOMASS 1 LF - 1	Captured Methane - Landfill Gas	2009/05	56838 - 1 to 3138	3,138	09-BIO-OH-GATS-0054
NON39418	AMP Wind Farm / OMEGA JV 6 - AMP Wind Farm / Omega JV 6	Wind	2009/01	75447 - 1 to 1324	1,324	09-WND-OH-GATS-07
NON39418	AMP Wind Farm / OMEGA JV 6 - AMP Wind Farm / Omega JV 6	Wind	2009/02	75452 - 1 to 1582	1,582	09-WND-OH-GATS-07
NON39418	AMP Wind Farm / OMEGA JV 6 - AMP Wind Farm / Omega JV 6	Wind	2009/03	75473 - 1 to 1462	1,462	09-WND-OH-GATS-07
				**Transfer to GATS in Progress	8,275	
				Total Achieved	24,526	
				In-State Benchmark	24,526	

<u>Additional</u> Unit ID	Facility Name	Fuel Type	Month of Generation	Certificate Serial Numbers	Quantity	OH State Number
NON39371	Liberty I Plant - Liberty I Plant	Captured Methane - Landfill Gas	2009/06	75546 - 349 to 2215	1,867	09-BIO-IN-GATS-0020
NON39371	Liberty I Plant - Liberty I Plant	Captured Methane - Landfill Gas	2009/07	75568 - 1 to 2263	2,263	09-BIO-IN-GATS-0020
NON39371	Liberty I Plant - Liberty I Plant	Captured Methane - Landfill Gas	2009/08	75637 - 1 to 2243	2,243	09-BIO-IN-GATS-0020
NON39371	Liberty I Plant - Liberty I Plant	Captured Methane - Landfill Gas	2009/09	75773 - 1 to 137	137	09-BIO-IN-GATS-0020
MSET89752804	AEP FOWLER RIDGE 2 WF - 4	Wind	2009/11	80379 - 1 to 297	297	09-WND-IN-GATS-0080
MSET89752804	AEP FOWLER RIDGE 2 WF - 4	Wind	2009/12	83983 - 12747 to 18936	6,190	09-WND-IN-GATS-0080
MSET89752804	AEP FOWLER RIDGE 2 WF - 4	Wind	2009/01	83983 - 6374 to 12746	6,373	09-WND-IN-GATS-0080
MSET89752821	AEP FOWLER RIDGE 2-1 WF - 21	Wind	2009/12	84529 - 1 to 5156	5,156	09-WND-IN-GATS-0080
				Total Achieved	24,526	
				Additional Benchmark	24,526	
				2009 Non-Solar Compliance Result	49,052	

**Contracts with Koch Supply and Trading for 8,275 RECs are secured, but will not be transferred to CSP's GATS account until after the RECs are created in GATS. The RECs were generated from the University of Cincinnati facility (Certification Number 10-BIO-OH-GATS-0074) during the period August 1, 2008 and December 31, 2009, but due to the timing of the facility certification and the creation of the GATS account, the RECs won't be created in GATS until April 30, 2010 and shall be delivered to CSP soon after.

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Case No(s). 10-0486-EL-ACP

Summary: Report --2009 Alternative Energy Status & Compliance Report electronically filed by Mr. Steven T Nourse on behalf of Columbus Southern Power Company