



Vorys, Sater, Seymour and Pease LLP
Legal Counsel

52 East Gay St.
PO Box 1008
Columbus, Ohio 43216-1008

614.464.6400 | www.vorys.com

Founded 1909

Stephen M. Howard
Direct Dial (614) 464-5401
Direct Fax (614) 719-4772
Email smhoward@vorys.com

April 11, 2013

Ms. Barcy F. McNeal, Secretary
Public Utilities Commission of Ohio
180 E. Broad St., 11th Floor
Columbus, OH 43215-3793

Re: Case No. 13-882- EL-ACP
Integrys Energy Services, Inc.

Dear Ms. McNeal:

Please find enclosed a copy of the public version of the Alternative Energy Annual Status Report for Calendar Year 2012. Certain items in this Report are redacted and a motion for protective order is also being filed today. Three copies of the confidential version will be submitted under seal.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in black ink that reads "Stephen M. Howard".

Stephen M. Howard
Attorney for Integrys Energy Services, Inc.

SMH/tjf
Enclosure

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2012

Integrus Energy Services, Inc.

Integrus Energy Services, Inc. (hereinafter "CRES") in accordance with Sections 4928.64 and 4928.65, Revised Code and Commission Rules 4901:1-40-03 and 4901:1-40-05 hereby submits this Annual Alternative Energy Report ("AER") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

I. Determination that an Alternative Energy Resource Report is Required (check one)

- ☒ During calendar year 2012 the CRES states that it conducted retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.
- ☐ During calendar year 2012 the CRES states that it did not conduct retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio. (If this block is checked proceed to the signature line)

II. Determination of the sales baseline for 2012

- a. During the past three calendar years the CRES made retail sales of generation in the amounts shown below
- 2009 51,696 MWh
- 2010 38,454 MWh
- 2011 77,081 MWh
- b. The average annual sales of the active years listed above (sum of the active years' MWh / no. of active years) 55,744 (hereinafter "Baseline Sales")
- c. If conditions exist that merit an adjustment to the Baseline Sales please list the adjusted Baseline Sales on this line _____ and attach as an exhibit to this AER a full explanation of the reason(s) for the adjustment(s).
- No conditions exist for an adjustment*
- d. If the CRES was not active during calendar years 2009, 2010 and 2011 but did make sales during calendar year 2012, please project the amount of retail electric generation sales anticipated for the whole of calendar year 2012 as would have been projected on the first day retail generation sales were made in Ohio.

MWh

Not applicable

III. Determination of the number of Solar and Total Renewable Energy Credits (RECs) Required and Statement of the Number of RECs Claimed

This response contains confidential and propriety information. This information has been submitted under seal and request for confidential treatment.

RENEWABLE ENERGY CREDITS REQUIRED AND OBTAINED FOR 2012

Types	No. of RECs Required (a).	No. of RECs Obtained (b)	Registry (c)	No. of RECs Sited in OH (d)
Solar				
Non Solar				
Total				

- a. Column (a) above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2012. The determinations were calculated by multiplying the Baseline Sales or Adjusted Baseline Sales or the Projected Sales (circle one) by 6 hundredths of one per cent (.06%) for Solar RECs and one and a half percent (1.5%) for total RECS. Total RECs include both Solar and Non Solar RECs.
- b. Column (b) above lists the number of Solar and Non Solar RECs for 2012 obtained by the CRES.
- c. Column (c) above lists the approved registry being used by the CRES. (This could be GATS, M-RETS, or if the CRES has RECs with both registries GATS and M-RETS).
- d. Column (d) above lists the RECs the CRES has obtained for 2012 from generation facilities sited within the state of Ohio. *Note: Per Staff Findings and Recommendation dated March 29, 2013 in Case No. 11-2449-EL-ACP, CRES has retired an additional in-state S-REC as recommended in Staff Recommendation (V)(2).*
- e. CRES states that it has (circle one) : a) received a *force majeure* determination for Solar RECs; b) sought but has yet to receive a ruling on a *force majeure* determine for Solar RECs; or c) did not seek or sought and did not receive a *force majeure* determination for Solar RECs.

IV. Compliance (check one)

- ☒ CRES states that it has obtained the required number of Solar RECs and Total RECs without adjustments permitted pursuant to Rule 4901:1-40-05(A)(3).
- ☐ CRES states that it has obtained the required number of Solar RECs and Total RECs after adjustments permitted pursuant to Rule 4901:1-40-05(A)(3). The type adjustment, reason for the adjustment and merit for making the requested adjustment of the proposed adjustments are detailed in an exhibit attached to this Report.
- ☐ CRES states that it is not in compliance with number of Solar RECs or Total RECs required for 2012.

V. Ten Year Forecast

a. Ten Year Forecast of Solar and Non Solar RECs

In accordance with Rule 4901:1-40-03(C) the CRES hereby provides a projection for the next 10 years for RECs and Solar RECs.

<u>Year</u>	<u>Solar RECs</u>	<u>Non Solar RECs</u>	<u>Total RECs</u>
2013			
2014			
2015			
2016			
2017			
2018			
2019			
2020			
2021			
2022			

b. Supply Portfolio projection

CRES intends to procure through commercial arrangements outlined below, required renewable energy supply (including Solar and Non Solar) from qualified resources that meet the specifications contained in Rule 4901:1-40-04. CRES intends to purchase from suppliers who have received a renewable energy facility

certificate from the Public Utilities Commission. In the event CRES purchases RECs, such purchases will come from suppliers that have joined an approved REC registry and will by contract transfer RECs from the generator's account to CRES' account.

- *Existing qualified renewable energy resources (operating facilities)*
- *Qualifying Renewable Energy Credit ("REC") transactions*
- *Wholesale contracted renewable electric generation*
- *Customer sited renewable electric generation*

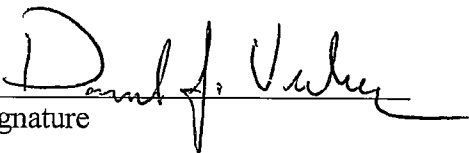
c. Methodology used to evaluate compliance

Since the price to compare will change at the end of the Electric Security Plan, projecting the ability to maintain sales let alone increase sales is problematic at best. Also, as the generation market is one of great volatility and because customers are free to contract with any CRES supplier, governmental aggregator or utilize a utility standard service offer, the CRES has assumed a 0.5 % increase in sales based on traditional growth in the electric generation market from the actual 2012 sales.

d. Comments on any perceived impediment(s) to achieving compliance with the Solar and Non Solar REC requirements, as well as any discussion addressing such impediments.

As long as the REC and S-REC market maintain sufficient liquidity, CRES does not foresee any impediments to achieving compliance.

I, Daniel J. Verbanac, am the duly authorized representative of Integrus Energy Services, Inc. To the best of my knowledge all the information contained in the foregoing report including any exhibits and attachments are true, accurate and complete.


Signature



Integrus Energy Services, Inc. - Reserve Subaccount Details - OH - Jan 2012-Dec 2012

Month/ Year	Unit ID	Facility Name	State Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number
04/2010						
12/2010						
12/2010						
06/2011						
07/2011						



Integrus Energy Services, Inc. - Reserve Subaccount Details - OH - Jan 2012-Dec 2012

Month/ Year	Unit ID	Facility Name	Certificate Serial Numbers	Solar Renewable Energy Source	Renewable Energy Source
04/2010					
12/2010					
12/2010					
06/2011					
07/2011					



Integrys Energy Services, Inc. - Reserve Subaccount Details - OH - Jan 2012-Dec 2012

Month/ Year	Unit ID	Facility Name	Certificate Serial Numbers	RPS	RPS Retail LSE Price Subaccount	RPS Period	Deposit Date
04/2010							
12/2010							
12/2010							
06/2011							
07/2011							

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 13-0882-EL-ACP

Summary: Report Alternative Energy Annual Status Report for Calendar Year 2012
electronically filed by Mr. Stephen M Howard on behalf of Integrys Energy Services, Inc.