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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Alternative :
Energy Portfolio Status Report of : Case No. 13-906-EL-ACP
Dominion Retail, Inc. :

ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT
OF
DOMINION RETAIL, INC.

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I. INTRODUCTION

Dominion Retail, Inc. ("Dominion Retail") is a Commission-certified provider of competitive retail electric service to consumers in this state. As an electric services company as defined in Section 4928.01(A)(9), Revised Code, Dominion Retail is subject to Rule 4901:1-40-05(A)(1), Ohio Administrative Code ("OAC"), which requires jurisdictional electric utilities and electric services companies to submit annual alternative energy portfolio status reports regarding their compliance with the advanced and renewable energy benchmarks set forth in Section 4928.64(B), Revised Code, and Rule 4901:1-40-03(A), OAC, for the preceding calendar year. Dominion Retail hereby submits its alternative energy portfolio status report for the calendar 2012 reporting period.

II. APPLICABLE BENCHMARKS

A. Statutory Benchmark Criteria

Under the benchmarks for 2012 established by Section 4928.64(B)(2), Revised Code, and Rule 4901:1-40-03(A), OAC, electric utilities and electric services companies were to supply 1.50% of the electricity delivered to their Ohio customers from renewable energy resources, with

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0.06% of the 1% total requirement to be delivered from solar energy resources. In addition, at least one-half of these renewable energy resources and solar energy resources requirements were to be generated by facilities located in Ohio, while the remainder of these requirements were to be met through resources that can be shown to be deliverable into Ohio, as provided in Section 4928.64(B)(3), Revised Code, and Rule 4901:1-40-03(A)(2)(a), OAC. Thus, the 2012 statutory benchmarks are calculated by carving out the solar component ($1.50\% - 0.06\% = 0.44\%$), then dividing the resulting non-solar component and the solar component by two to allocate the requirement for both components between Ohio and non-Ohio resources ($0.44\% \div 2 = 0.22\%$, $0.06\% \div 2 = 0.03\%$). Accordingly, the 2012 benchmarks are as follows:

Ohio Renewable (less Solar)	0.72%
Non-Ohio Renewable (less Solar)	0.72%
Ohio Solar	0.03%
Non-Ohio Solar	<u>0.03%</u>
Total Requirement	1.50%

B. 2012 Baseline

To determine compliance with the above benchmarks, a baseline for the reporting year must be established. Rule 4901:1-40-03(B)(2), OAC, provides that, subject to certain exceptions not relevant here, the baseline for an electric services company shall be the average for the preceding three years of the total annual kilowatt-hours of electricity sold by the company to retail electric consumers in the state, based upon the kilowatt-hour sales in the company's most recent quarterly market-monitoring reports or reporting forms. As previously reported to the Commission, Dominion Retail's total annual sales to retail consumers in Ohio for 2009, 2010, and 2011 were 372,587,000 kWh, 794,511,000, and 863,992,000 kWh respectively, which, when averaged, produces an indicated 2012 baseline for Dominion Retail of 677,030,000 kWh, or 677,030 MWh.

C. Benchmark Summary

Using the 2012 baseline of 677,030 MWh as determined above, the MWh alternative energy resource benchmarks applicable to Dominion Retail are as shown of the following table.

<u>Resource Category</u>	<u>MWh Baseline</u>	<u>Benchmark %</u>	<u>MWh Benchmark</u>
Ohio Renewable	677,030	0.72%	4,874.462
Non-Ohio Renewable	677,030	0.72%	4,874.462
Ohio Solar	677,030	0.03%	203.109
Non-Ohio Solar	677,030	0.03%	203.109

Rule 4901:1-40-08(A), OAC, provides that, for purposes of determining the amount of any required compliance payment, the amount of under-compliance shall be rounded to the next MWh. Under this rounding convention, the applicable 2012 benchmarks for Dominion Retail become 4,875 MWh for Ohio and Non-Ohio Renewables and 204 MWh for Ohio and Non-Ohio Solar.

III. 2011 BENCHMARK COMPLIANCE STATUS

Section 4928.65, Revised Code, and Rule 4901:1-40-04(D), OAC, permit electric services companies to satisfy all or part of a renewable energy resource benchmark by the purchase of renewable energy credits ("RECs").¹ As a member in good standing of PJM's generation attributes tracking system, Dominion Retail is eligible to utilize RECs for this purpose under Rule 4901:1-40-04(D)(2)(a), OAC. Section 4928.65, Revised Code, also permits eligible electric services companies to bank any surplus RECs purchased during an annual reporting

¹ Section 4928.65 provides that, with certain exceptions not relevant here, one REC equals one MWh.

period and to carry the surplus forward for application to the benchmarks in subsequent years, so long as they are applied within the five years following the date of purchase.

As documented in its 2011 Status Report, Dominion Retail purchased RECs in 2011 in excess of those required to meet its applicable benchmark obligations for each category in that year. Dominion Retail has since retired certain of its surplus banked Non-Ohio Solar RECS to meet compliance obligations in other states, but has subsequently purchased additional 2012 RECs in all four resource categories. As a result, Dominion Retail has more than sufficient 2012 RECs available to meet its 2012 benchmark obligations for each category. The following table shows, by resource category, the RECs available to apply to Dominion Retail's 2012 benchmark obligations.

<u>Resource Category</u>	<u>Remaining Banked Pre-2012 RECs</u>	<u>RECs Purchased in 2012</u>	<u>Total 2012 RECs Available</u>
Ohio Renewable	4,604	300	4,904
Non-Ohio Renewable	4	5,000	5,004
Ohio Solar	33	190	223
Non-Ohio Solar	4	211	215

All these available RECs originated from facilities that meet the definition of a renewable energy resource as required by Rule 4901:1-40-4(D)(1), OAC. In addition, these RECS were all associated with electricity generated after July 31, 2008 as required by Rule 4901:1-40-4(D)(5), OAC.

Comparing the total 2011 RECs available in each resource category with the applicable 2011 benchmarks produces the results shown on the following table.

<u>Resource Category</u>	<u>Total 2012 RECs Available</u>	<u>MWh Benchmark</u>	<u>Surplus/(Deficiency)</u>
Ohio Renewable	4,904	4,875	29
Non-Ohio Renewable	5,004	4,875	129
Ohio Solar	223	204	19
Non-Ohio Solar	215	204	11

As indicated by the information presented in the table, Dominion Retail has fully complied with the applicable 2012 Ohio Renewable, Non-Ohio Renewable, Ohio Solar, and Non-Ohio Solar benchmarks, and intends to carry over the surplus in each category for application in subsequent reporting years to the extent permitted by Section 4928.65, Revised Code. The description of the RECs retired to satisfy each of these benchmarks is shown in Exhibit A to this report, the unredacted version of which is being filed herewith under seal pursuant to a motion for a protective order.

IV. CONCLUSION

WHEREFORE, Dominion Retail respectfully requests that the Commission find that Dominion Retail has fully complied with its 2012 Ohio Renewable, Non-Ohio Renewable, Ohio Solar, and Non-Ohio Solar benchmarks and that no compliance payments are required at this time.

Respectfully submitted,


 Barth E. Royer

BELL &, ROYER CO., LPA
33 South Grant Avenue
Columbus, Ohio 43215-3927
(614) 228-0704 – Phone
(614) 228-0201 – Fax
BarthRoyer@aol.com – Email

Gary A. Jeffries
Assistant General Counsel
Dominion Resources Services, Inc.
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817
(412) 237-4729 – Phone
(412) 237-4782 – Fax
Gary.A.Jeffries@dom.com – Email

Attorneys for Dominion Retail, Inc.

EXHIBIT A

(REC Details Sheet)

REDACTED