January 31, 2014

**VIA FEDERAL EXPRESS** 

Public Utilities Commission of Ohio 180 East Broad Street Columbus, Ohio 43215-3793

RE:

**DOCKET NO. 13-1974-EL-ACP** 

GDF SUEZ Energy Resources NA, Inc. - Certificate Number 04-118(1) issued in Case No. 04-1015-EL-CRS

AMENDED - 2012 RPS / ALTERNATIVE ENERGY PORTFOLIO REPORT

This information is submitted by GDF SUEZ Energy Resources NA, Inc. ("GDF Suez") pursuant to Chapter 4901-40 Alternative Energy Portfolio Standards of the Ohio Administrative Code. Enclosed, please find GDF Suez's **AMENDED** 2012 RPS/Annual Alternative Energy Portfolio Report. If you require any additional information in connection with this filing, please contact me at (713) 636-1607.

Sincerely.

Naveen Rabie Counsel

MECEIVED-DOCKETING DIV

Naveen Rabie Counsel

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Technician Date Processed FEB 0 4 2014

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

**GDF SUEZ Energy Resources NA, Inc.** (hereinafter the "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.

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.

- Determination of the sales baseline for 2012.
  - (a) During the past three (3) calendar years, the CRES did not make retail sales generation.
  - (b) If the CRES was not active during the past three (3) calendar years, but did make sales during calendar year 2012, please project the amount of retail electric generation sales anticipated for the whole calendar year 2012 as would have been projected on the first day retail generation sales were made in Ohio.

Since the CRES was not active within Ohio for the past three calendar years, the actual metered load served in 2012 will be used for the determination of the baseline sales.

139,401 MWh

III. Determination of the number of Solar and Total Renewable Energy Credits (RECs) required and statement of the number of RECs claimed

Types	(a) No. of RECs Required	(b) No. of RECs Obtained	(c) Registry	(d) No. of In-State Qualified RECs
Solar	84	98	PJM - GATS	49
Non Solar	2091	2310	PJM GATS	1700
Total	2175	2408		1749

- (a) Column (a) above represents the unadjusted number of Solar and Total RECs required for the CRES in 2012. The determinations were calculated by multiplying the baseline sales by 0.06% for Solar RECs and 1.5% for Total RECs. Total RECs include both Solar and Non Solar RECs.
- (b) The CRES states that it has obtained the number of Solar and Non Solar RECs listed in column (b) above for 2012.
- (c) The CRES used PJM GATS registry for the RECs detailed above.
- (d) The CRES states that of the RECs obtained for 2012, the number listed in column (d) above represents RECs approved as in-state qualified generation facilities according to Ohio's Alternative Energy Portfolio Standard Section 4901:1-40-03(B)(2)(9).

## IV. Compliance.

The CRES states that it has obtained the required number of Solar and Total RECs without adjustments permitted pursuant to Rule 4901:1-40-05(A)(3).

## V. Ten Year Forecast.

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

The CRES began serving customers during 2011 and continues to grow and establish new customer contracts in Ohio. Because the CRES is not a standard utility with a stable customer base, it cannot accurately project load ten (10) years in advance. The competitive Ohio market and the short-term nature of retail contracts limit the CRES to a six (6) year sales forecast. Accordingly, below are forecasted sales volumes and corresponding REC requirements for the years 2013, 2014, 2015, 2016, and 2017. This forecast is based on load currently under contract rounded to the nearest 5,000 MWh.

Year	Solar RECs	Non Solar RECS	Total RECs	Forecasted MWh
2013	414	8,786	9,200	460,000
2014	408	8,092	8,500	340,000
2015	210	4,690	4,900	140,000
2016	198	4,752	4,950	110,000
2017	11	264	275	5,000

(b) Supply portfolio projection.

The CRES does not own a generation asset that can be utilized for Ohio compliance and does not carry forward Total RECs in a supply portfolio beyond the supply necessary to cover obligations for contracted loads. The CRES generally purchases Total RECs on an as needed basis.

(c) Methodology used to evaluate Compliance.

The CRES will continue to meet its alternative energy benchmarks through the purchasing of RECs and Solar RECs through the use of market brokers and through bilateral contracts with REC suppliers.

(d) Comments on perceived impediments to achieving compliance of Solar and Total REC requirements.

Apart from generalized supply and pricing constraints, the CRES does not anticipate significant impediments in acquiring the RECs required to meet its alternative energy benchmarks for future years.

## VI. Conclusion.

Based on the foregoing, the CRES respectfully requests that the Commission find that the CRES has complied with the applicable renewal energy benchmarks for 2012.

I, Naveen Rabie, am the duly authorized representative of GDF SUEZ Energy Resources NA, Inc. and state to the best of my knowledge and ability, all the information contained in the foregoing Competitive Retail Electric Service Provider Alternative Energy Resource Report for Calendar Year 2012 are true, accurate and complete.

Naveen Rabie

GDF SUEZ Energy Resources NA, Inc.