VORYS

Vorys, Sater, Seymour and Pease LLP Legal Counsel

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 14, 2014

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

> Re: Case No. 14-601-EL-ACP Cincinnati Bell Energy, LLC

Dear Ms. McNeal:

I am filing a redacted version of the Alternative Energy Compliance Report for Calendar Year 2013 for Cincinnati Bell Energy, LLC. This report is redacted because it contains certain confidential and proprietary information. Pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, a motion for protective order has been filed and three copies of the confidential version of this report are being submitted under seal.

Thank you for your consideration.

Sincerely yours,

Stephen M. Howard

Stephen M. Howard Attorneys for Cincinnati Bell Energy, LLC

SMH/smf

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2013

Cincinnati Bell Energy, LLC, (hereinafter "CRES"), in accordance with Sections 4928.64 and 4928.65, Revised Code and Commission Rules 4901:11-40-03 and 4901:1-40-05, hereby submits this Annual Alternative Energy Report ("AER")

detailing compliance with Ohio Alternative Energy Portfolio Standards ("OH AEPS"),

- I. Determination that an Alternative Energy Resource Report is Required
 - a. During Calendar year 2013, the CRES stets that it conducted retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.
- II. Determination of the sales baseline for 2013
 a. during the past three calendar years, the CRES made retail sales of generation in the amounts shows below:
 - i. 2010- 0 MWh
 - ii. 2011- 23,554 MWh
 - iii. 2012- 125,864 MWh
- III. Determination of the number of solar and total Renewable Energy Credits (RECs) required and statement of the number of RECs Claimed.

Renewable Energy Credits Required And Obtained For 2013							
Types	No. of RECs Required(a)	No. of RECs obtained (b)	Registry (c)	No. of RECs sited in Ohio (d)	No. of RECs sited in Ohio Adjacent states		
Solar	67	67	PJM GATS	34	33		
Non-Solar	1,427	1,427	PJM GATS	1,427	0		
Total	1,494	1,494	PJM GATS	1,461	33		

- a. Column (a) above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2013.
- b. The CRES states that it has obtained the number of Solar and Non Solar RECs listed in column (b) above for 2013.
- c. The CRES used the PJM GATS registry for the RECs detailed above. Please note that the GATS account holder is Viridian energy PA LLC ("VEPA"), an affiliate of the CRES. Both the CRES and VEPA are wholly owned subsidiaries of Regional Energy Holdings, Inc (REHI), and VEPA is the entity under which REHI serves most of its electricity load in the PJM territory. All electricity served in Ohio, however, is under the CRES.
- d. The CRES states that, of the RECs it has obtained for 2013, the number listed in column (d) represents the RECs with generation facilities sited within the state of Ohio.

IV. Compliance

- a. 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).
- V. Ten Year Forecast
 - a. In accordance with Rule 4901:1-40-03(0) the CRES hereby provides a projection for the next 10 years for RECs and Solar RECs.

b. Supply portfolio projection

The CRES does not own any generation assets that can be utilized for Ohio compliance. CRES intends to purchase both Solar and Non-Solar RECs from generators who have been certified as renewable from PUCO, have joined an approved REC registry and will transfer RECs from the generator's account to the CRES account.

c. Methodology used to evaluate compliance

CRES has used internal forecasting methods to forecast our retail sales over the next ten years, and multiplied the annual sales by the then-current Ohio Alternative Energy Portfolio Standards percentage.

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.

CRES does not have any comments at this time.

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2013

I, Kevin Bhuva, am a duly authorized representative of Cincinnati Bell Energy LLC, and state, to the best of my knowledge and ability, all the information contained in the foregoing Competitive Retail Electric Service Provider Alternative Energy Resources Report for Calendar Year 2013, including any exhibits and attachments, are true, accurate and complete.

Kevin Bhuva Director - Finance & Risk

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data
2010	0	0	0	(A)
2011 2012	23,554	0	23,554 125,864	(B)
2012	123,004		125,004	
iseline fo	or 2013 Compliance Obligation	(74,709	(D) = AvgABC
2.00%	2013 Statutory Compliance Obli	gation		_
	2013 Non-Solar Renewable Bend	hmark	1.91%	(E)
	2013 Solar Renewable Benchma	'k	0.09%	(F)
	Per ORC, 4928.64(B)(2)	-		-
	2013 Compliance Obligation			
	Non-Solar RECs Needed for Com	pliance	1,427	(G) = (D)*(E)
	Minimum Required from Ohio		714	(H) = (G) * 0.5
	Solar RECs Needed for Complian	ce [67	(I) = (D) * (F)
	Minimum Required from Ohio		34	
	Carry-Over from Previous Year(i) if applicable		
	Ohio Non-Solar - MWHs	ii, ii oppiicable	r ar de la	(K)
	Other Non-Solar - MWHs			111
	Obie Celes MANULE	1	2000 Data	- (M)
	Ohio Solar - MWHs Other Solar - MWHs		C	
			· · ·	
	Total 2013 Compliance Obligation			(O) = (G) + (K) + (L)
	Non-Solar RECs Needed for Com Minimum Required from Ohio		1,427	
	talliningin nequired from one			
	Solar RECs Needed for Complian		67	
	Minimum Required from Ohio	Facilities	34	(R) = (J) + (M)
	2013 Performance (Per GATS or	MRETS Data)		_
	Ohio Non-Solar - MWHs	ĺ	1,427	(5)
	Other Non-Solar - MWHs			(т)
	Ohio Solar - MWHs	1	utalia eta 2.34	1 (U)
	Other Solar - MWHs		39	
	Under Compliance in 2013, if ap	plicable		
	Ohio Non-Solar - MWHs	1	-713	3 (W) = (P) - (S)
	Other Non-Solar - MWHs		713	
	Ohio Solar - MWHs	I		(Y) = (R) - (U)
	Other Solar - MWHs		((1) = (1) + (0) (Z) = (Q - R) - (V)
	2012 Alternative Compliance P	umonte		
	2013 Alternative Compliance Pa Non-Solar, per MWH (Refer to C		\$48.56	5 (AA)
	Solar, per MWH - per 4928.64(C	-	\$350.00	
				-
	2013 Payments, if applicable Non-Solar Total	-	\$0.00	(CC) ≃ (W+X) * (AA
	Non-Solar Lotal Solar Total		\$0.00	
	TOTAL		\$0.00	
	2			

This formula assumes sales during at least one of the 3 preceding years. If that is not the case, then rows A, B and C should be zero and estimated or actual sales should be used in row D. Refer to 4901:1-40-03(B), OAC, for details on the baseline calculation methodologies. Contact Staff with any questions. This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/14/2014 11:15:10 AM

in

Case No(s). 14-0601-EL-ACP

Summary: Report Alternative Energy Compliance Report for Calendar Year 2013 electronically filed by Mr. Stephen M Howard on behalf of Cincinnati Bell Energy, LLC