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April 14, 2014

Ms. Barcy F. McNeal, Secretary
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Re: Dominion Retail, Inc.
2013 ACP Report
Case No. 14-626-EL-ACP

Dear Ms. McNeal:

Pursuant to Rule 4901:1-40-05(A)(1), Ohio Administrative Code ("OAC"), Dominion Retail, Inc. ("Dominion Retail") herewith submits for filing its alternative energy portfolio status report demonstrating 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 2013 calendar year reporting period. The confidential, unredacted version of the exhibit to the report showing the RECs acquired and retired by Dominion Retail to comply with the applicable benchmarks is also filed herewith pursuant to an accompanying motion for a protective order.

As an electric services company as defined in Section 4928.01(A)(9), Revised Code, Dominion Retail is also subject to Rule 4901:1-40-03(C), OAC, which requires jurisdictional electric utilities and electric services companies to submit, annually, a plan for compliance with future annual advanced and renewable energy statutory benchmarks utilizing at least a ten-year planning horizon. Please be advised that Dominion Retail has decided to terminate operations as a provider of competitive retail electric service ("CRES"). As described in the March 18, 2014 notice submitted to the Commission's Director of Service Monitoring and Enforcement Division pursuant to Rule 4901:1-21-11(D)(1)(a), OAC, Dominion Retail has entered into a transaction with NRG Energy, Inc. that will ultimately result in Dominion Retail assigning all its Ohio customer contracts to Reliant Energy Northeast LLC d/b/a NRG Residential Solutions. The contract assignments will be effective upon the next meter reading dates of the respective customers, but no sooner than May 1, 2014. Thereafter, Dominion Retail will no longer be supplying generation service to customers in this state. Once the contract assignments are completed, Dominion Retail will forthwith file an application with the Commission pursuant to Rule 4901:1-24-11(B), OAC, seeking approval to abandon the service provided pursuant to its existing CRES certificate and the cancellation of such certificate.

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Page Two

In view of the foregoing, Dominion Retail will not be filing a plan for compliance with future annual advanced and renewable energy statutory benchmarks. Any residual compliance obligation for the calendar 2014 reporting period will be addressed through the purchase of renewable energy credits.

Thank you for your attention to this matter.

Sincerely,

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Barth E. Royer
Attorney for Dominion Retail, Inc.

cc: Stuart Siegfried, PUCO Staff

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Alternative :
Energy Portfolio Status Report of :
Dominion Retail, Inc. :

Case No. 14-626-EL-ACP

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

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 2013 reporting period.

II. APPLICABLE BENCHMARKS

A. Statutory Benchmark Criteria

Under the benchmarks for 2013 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 2.0% of the electricity delivered to their Ohio customers from renewable energy resources, with

0.09% of the 2.0% 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 are to be generated by facilities located in Ohio, with the remainder of these requirements 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 2013 statutory benchmarks are calculated by carving out the solar component ($2.0\% - 0.09\% = 01.91\%$), 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 ($01.91\% \div 2 = 0.955\%$, $0.09\% \div 2 = 0.045\%$). Accordingly, the 2013 benchmarks are as follows:

Ohio Renewable (less Solar)	0.955%
Non-Ohio Renewable (less Solar)	0.955%
Ohio Solar	0.045%
Non-Ohio Solar	<u>0.045%</u>
Total Requirement	2.0%

B. 2013 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 2010, 2011, and 2012 were 794,511,000 kWh, 863,992,000 kWh, and 376,794,000 kWh respectively, which, when averaged, produces an indicated 2013 baseline for Dominion Retail of 678,432,334 kWh, or 678,432 MWh.

C. Benchmark Summary

Using the 2013 baseline of 678,432 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	678,432	0.955%	6,479.026
Non-Ohio Renewable	678,432	0.955%	6,479.026
Ohio Solar	678,432	0.045%	305.294
Non-Ohio Solar	678,432	0.045%	305.294

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 2013 benchmarks for Dominion Retail become 6,480 MWh for Ohio and Non-Ohio Renewables and 306 MWh for Ohio and Non-Ohio Solar.

III. 2013 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 2012 Status Report,² Dominion Retail had RECs available in 2012 in excess of those required to meet its applicable benchmark obligations for each resource category. Accordingly, Dominion Retail expressed its intention to bank these surplus RECs for application in subsequent years. Dominion Retail has also purchased additional 2013 RECs in all four categories. As a result, Dominion Retail has sufficient RECs available to meet its 2013 benchmark obligations for each category. The following table shows, by resource category, the RECs available to apply to Dominion Retail's 2013 benchmark obligations.

<u>Resource Category</u>	<u>Remaining Banked Pre-2013 RECs</u>	<u>RECs Purchased in 2013</u>	<u>Total 2013 RECs Available</u>
Ohio Renewable	29	7,000	7,029
Non-Ohio Renewable	129	7,000	7,129
Ohio Solar	19	287	306
Non-Ohio Solar	11	350	361

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 2013 RECs available in each resource category with the applicable 2013 benchmarks produces the results shown on the following table.

² *In the Matter of the Alternative Energy Portfolio Status Report of Dominion Retail, Inc.*, Case No. 13-906-EL-ACP, Application dated April 15, 2013, at 5.

<u>Resource Category</u>	<u>Total 2013 RECs Available</u>	<u>MWh Benchmark</u>	<u>Surplus/(Deficiency)</u>
Ohio Renewable	7,029	6,480	549
Non-Ohio Renewable	7,129	6,480	649
Ohio Solar	306	306	0
Non-Ohio Solar	361	306	55

As indicated by the information presented in the table, Dominion Retail has fully complied with the applicable 2013 Ohio Renewable, Non-Ohio Renewable, Ohio Solar, and Non-Ohio Solar benchmarks and, in fact, has surplus RECs available in three of the four categories, which could be carried over 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 confidential, 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 2013 Ohio Renewable, Non-Ohio Renewable, Ohio Solar, and Non-Ohio Solar benchmarks and that no compliance payments are required at this time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. E. Royer', with a long horizontal flourish extending to the right.

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EXHIBIT A

(REC Details Sheet)

REDACTED