BEFORE THE PUBLIC UTILITY COMMISSION OF OHIO

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IN THE MATTER OF CHAMPION ENERGY SERVICES, LLC'S ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT AND PLAN FOR COMPLIANCE WITH FUTURE ANNUAL ADVANCED AND RENEWABLE ENERGY BENCHMARKS

Case No. 14-____-EL-ACP

CHAMPION ENERGY SERVICES, LLC'S ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT AND PLAN FOR COMPLIANCE WITH FUTURE ANNUAL ADVANCED AND RENEWABLE ENERGY BENCHMARKS

I. INTRODUCTION

Champion Energy Services, LLC ("CES") is an electric services company as defined by Section 4928.01(A)(9), Revised Code, having been issued Certificate No. 09-166E by the Public Utilities Commission of Ohio ("Commission"). CES hereby submits its annual alternative energy portfolio status report for the 2013 calendar year, as required by Rule 4901:1-40-05, Ohio Administrative Code ("O.A.C."), and its plan for compliance with future annual advanced and renewable energy benchmarks, as required by Rule 4901:1-40-03(C), O.A.C.

II. ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT

Pursuant to Section 4928.64(B)(2), Revised Code, and Rule 4901:1-40-03(A)(2), O.A.C., for the year 2013, electric service companies must demonstrate that at least 2.0% of retail electricity supplied was derived from renewable energy resources, including 0.090% from solar energy resources. At least half of the renewable energy resources, including solar energy resources, used to meet these benchmarks must have been generated by facilities located in Ohio. The level of these benchmark requirements is determined by first calculating a baseline number of kilowatt-hours sold and then applying the benchmark percentages to that baseline.

A. Baseline Calculation

Under Rule 4901:1-40-03(B)(2), an electric service company's baseline is computed by averaging the number of kilowatt hours sold during the three preceding calendar years. As such, CES computes its baseline as an average of its 2010, 2011, and 2012 annual sales, which is 1,284,159 MWh. Calculations for Champion's baseline calculation is provided below.

B. 2013 Renewable and Solar Energy Resource Benchmarks

Based on sales of 47,185 MWh, 819,393 MWh, and 2,985,899 MWh for 2010, 2011, and 2012 respectively, Champion calculated a baseline of 1,284,159 MWh for 2013. Based on this baseline, CES's calculation of its benchmarks for electricity generated from renewable and solar energy resources for the year 2013 is as follows:

| 2013 Baseline | | 1,284,159 MWh |
|---------------------|--------------------------|---------------|
| Total Renewable and | Solar Requirement (2.0%) | 25,683 MWh |
| 2012 Renewable Req | uirement | 24,527 MWh |
| (Total Less Solar) | | |
| 2012 Renewable Req | uirement by Jurisdiction | 12,264 MWh |
| (Total Less Solar) | | |
| Ohio | 50% | 6,132 MWh |
| Out-of-State | 50% | 6,132 MWh |
| 2012 Solar Requirem | ent | 1,156 MWh |
| Ohio | 50% | 578 MWh |
| Out-of-State | 50% | 578 MWh |

C. Demonstration of Compliance with 2013 Benchmarks

Pursuant to § Ohio Rev. Code 4928.65, electric service companies may meet their renewable energy benchmarks through the use of renewable energy credits ("RECs"). CES has successfully met its renewable energy benchmarks using RECs. To demonstrate compliance, CES is submitting as **Exhibit A**, a copy of its RPS Compliance from PJM.

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1. In-state, Non-Solar, Renewable Energy Credits

CES obtained sufficient non-solar, in-state RECs to fully satisfy its 2013 REC obligations. CES evaluated its compliance options on an economic basis. CES found that RECs were available for each tier at prices lower than the optional compliance payment.

2. Out-of-State, Non-Solar, Renewable Energy Credits

By means of economically sound purchasing, CES was able to obtain sufficient non-solar adjacent state RECs to fully satisfy its 2013 REC obligations.

3. Out-of-State and In-state Solar Renewable Energy Credits

Section 4901:1-40-03(A)(2) of the O.A.C. requires that all electric utilities and affected electric services companies demonstrate that 0.09 percent of their retail electric sales are generated by solar energy resources by the end of 2013. CES obtained sufficient solar RECs ("SRECs") to fully satisfy its 2013 SREC obligations.

III. PLAN FOR COMPLIANCE WITH FUTURE ANNUAL ADVANCED AND RENEWABLE ENERGY BENCHMARKS

Rule 4901:1-40-03(C), O.A.C., requires that each electric services company file an annual plan for compliance with future annual advanced and renewable energy benchmarks, including solar, utilizing at least a ten-year planning horizon. The plan shall include the following items: (1) baseline for current and future calendar years; (2) supply portfolio projection, including both generation fleet and power purchases; (3) description of the methodology used by the company to evaluate its compliance options; and (4) a discussion of any perceived impediments to achieving compliance with required benchmarks, as well as suggestions for addressing any such impediments.

A. Baseline for Current and Future Calendar Years

In compliance with Section 4901:1-40-03(C) of the O.A.C., CES is submitting as Exhibit

B its compliance plan using a ten-year planning horizon.

B. Supply Portfolio Projection, Including Both Generation Fleet and Power Purchases

CES has no plan to construct or purchase any electric generation facilities. Therefore, CES will continue to supply power to its customers by purchasing power through the wholesale market.

C. Description of Methodology Used to Evaluate Compliance Options

As noted above, CES does not own or anticipate owning any generation facilities. Therefore, CES will meet its alternative energy benchmarks through the purchasing of RECs and SRECs. See Exhibit B.

D. Perceived Impediments to Achieving Compliance with Required Benchmarks

Aside from the potential for supply and pricing constraints in the market for RECs, CES does not anticipate significant impediments to achieving compliance with its required benchmarks.

IV. CONCLUSION

CES respectfully requests that the Commission find that CES has complied with the applicable renewable energy resource benchmarks for 2013 and its associated reporting requirements.

Respectfully submitted,

By Permission - #0080803 h

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Attorney for Champion Energy Services, LLC

April 15, 2014

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<u>Exhibit B</u>

| FO | DRECAST | BASELINE | | R | PS | | PROJECTED REC | | D RECS |
|------|---------|----------|------|--------|-------|--------|---------------|-----|--------|
| Year | MWh | Year MWh | Year | REC | SREC | Total | Year | REC | SREC |
| 2014 | | 2014 | 2014 | 2.38% | 0.12% | 2.50% | 2014 | 5 | |
| 2015 | | 2015 | 2015 | 3.35% | 0.15% | 3.50% | 2015 | | |
| 2016 | | 2016 | 2016 | 4.32% | 0.18% | 4.50% | 2016 | | |
| 2017 | | 2017 | 2017 | 5.28% | 0.22% | 5.50% | 2017 | | |
| 2018 | | 2018 | 2018 | 6.24% | 0.26% | 6.50% | 2018 | | |
| 2019 | | 2019 | 2019 | 7.20% | 0.30% | 7.50% | 2019 | | |
| 2020 | | 2020 | 2020 | 8.16% | 0.34% | 8.50% | 2020 | | |
| 2021 | | 2021 | 2021 | 9.12% | 0.38% | 9.50% | 2021 | | |
| 2022 | | 2022 | 2022 | 10.08% | 0.42% | 10.50% | 2022 | | |
| 2023 | | 2023 | 2023 | 11.04% | 0.46% | 11.50% | 2023 | | |
| 2024 | | 2024 | 2024 | 12.00% | 0.50% | 12.50% | 2024 | | |

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Case No(s). 14-0671-EL-ACP

Summary: Report Champion Energy Services, LLC's Annual Alternative Energy Portfolio Status Report and Plan for Compliance with Future Annual Advanced and Renewable Energy Benchmarks electronically filed by Ms. Sarah K Merrick on behalf of Champion Energy Services, LLC