



14-0693-EL-ACP  
7

VIA FEDERAL EXPRESS

April 15, 2014

Docketing Division  
Ohio Public Utilities Commission  
180 East Broad Street  
Columbus, OH 43215-3793

RECEIVED-DOCKETING DIV  
2014 APR 16 PM 4:07  
PUCO

RE: Consolidated Edison Solutions, Inc.'s  
2013 Forward Looking Ohio AEPS Compliance Plan

To Whom It May Concern:

Enclosed for filing is Consolidated Edison Solutions, Inc.'s ("Con Edison Solutions") 2013 Forward Looking Ohio AEPS Compliance Plan.

Con Edison Solutions hereby requests a waiver of the following requirement concerning its 2013 Baseline Compliance obligation.

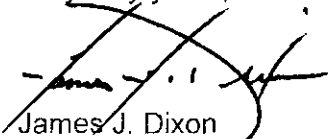
Ohio Administrative Code Section 4901:1-40-03(B),(2)(b):

(b) For an electric services company with no retail electric sales in the state during the preceding three calendar years, its initial baseline shall consist of a reasonable projection of its retail electric sales in the state for a full calendar year. Subsequent baselines shall consist of actual sales data, computed in a manner consistent with paragraph (B)(2)(a) of this rule.

Con Edison Solutions did not serve retail customers during any of the three preceding years (2010, 2011, and 2012). Accordingly, Con Edison Solutions is unable to calculate a baseline 2013 compliance obligation using the average of the three prior years. The above referenced regulation (Section 4901:1-40-03(B),(2),(b)), requires electric service companies with no sales during the prior three year period to calculate the baseline obligation using a projection of sales for a full calendar year. ConEdison Solutions requests a waiver of this requirement and instead proposes to calculate its 2013 baseline obligation using actual retail electric sales during the 2013 compliance period, as shown on the accompanying form.

If you have any questions regarding this submission, please call Doniyell L. Curtis @ (914) 286-7037.

Very truly yours,

  
James J. Dixon  
Assistant Secretary

## 2013 Forward Looking Ohio AEPS Compliance Plan

### Consolidated Edison Solutions, Inc.

#### Ohio Administrative Code, 4901:1-40-03(C)

---

*(C) Beginning in the year 2010, each electric utility and electric services company annually shall file a plan for compliance with future annual advanced- and renewable-energy benchmarks, including solar, utilizing at least a ten-year planning horizon. This plan, to be filed by April fifteenth of each year, shall include at least the following items:*

*(1) Baseline for the current and future calendar years.*

**Response: Please see attached spreadsheet for a 10 year projection of ConEdison Solutions' retail sales.**

*(2) Supply portfolio projection, including both generation fleet and power purchases.*

**Response: ConEdison Solutions does not own or operate generation assets and does not intend to meet its compliance obligations with physical renewable energy purchases.**

*(3) A description of the methodology used by the company to evaluate its compliance options.*

**Response: ConEdison Solutions will procure the requisite number of solar and non-solar renewable energy certificates to meet its Ohio renewable portfolio standard requirements in future years. ConEdison Solutions has a well established network of counterparties that it can purchase eligible renewable energy certificates from, including REC brokers, other wholesale power marketers, renewable energy developers and other counterparties.**

*(4) A discussion of any perceived impediments to achieving compliance with required benchmarks, as well as suggestions for addressing any such impediments.*

**Response: ConEdison Solutions does not perceive any impediments to achieving future compliance.**

# Consolidated Edison Solutions, Inc. - My RPS Compliance - OH - Jan 2013 - Dec 2013

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Total Generation for Subaccount	Solar Renewable Energy Source	Renewable Energy Source	Total Certificates Used for RPS
Consolidated Edison Solutions, Inc.	Default	AEP	1,660		34	2	32	34
Consolidated Edison Solutions, Inc.	Default	ATSI	438		8	0	8	8
Consolidated Edison Solutions, Inc.	Reserve Subaccount		0		0	0	0	0
<b>Total</b>			<b>2,098</b>		<b>42</b>	<b>2</b>	<b>40</b>	<b>42</b>

# Consolidated Edison Solutions, Inc. - Reserve Subaccount Details - OH - Jan 2013 - Dec 2013

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	Solar Renewable Energy Source
Default	AEP	10/2012	NON41170	Phillips Residence - Phillips Residence	OH	SUN	533243 - 1 to 1	1	10-SPV-OH-GATS-0101	Yes
Default	AEP	04/2011	NON44654	Pocono Raceway 3 MW PV Power Plant - Pocono Raceway 3 MW PV Power Plant	PA	SUN	207369 - 313 to 313	1	11-SPV-PA-GATS-0329	Yes
Default	AEP	08/2011	NON40144	Prairie View II Landfill Gas Facility - Prairie View Gas Recovery	IN	LFG	275121 - 1 to 16	16	09-BIO-IN-GATS-0022	
Default	AEP	10/2013	NON39418	AMP Wind Farm / OMEGA JV 6 - AMP Wind Farm / OMEGA JV 6	OH	WND	825558 - 88 to 103	16	09-WND-OH-GATS-0007	
Default	ATSI	08/2011	NON40144	Prairie View II Landfill Gas Facility - Prairie View Gas Recovery	IN	LFG	275121 - 17 to 20	4	09-BIO-IN-GATS-0022	
Default	ATSI	10/2013	NON39418	AMP Wind Farm / OMEGA JV 6 - AMP Wind Farm / OMEGA JV 6	OH	WND	825558 - 104 to 107	4	09-WND-OH-GATS-0007	

# Consolidated Edison Solutions, Inc. - Reserve Subaccount Details - OH - Jan 2013 - Dec 2013

Renewable Energy Source	RPS	RPS Price	RPS Period	Deposit Date
	Yes	\$100.00	2013	04/15/2014
	Yes	\$100.00	2013	04/15/2014
Yes	Yes	\$5.00	2013	04/15/2014
Yes	Yes	\$15.50	2013	04/15/2014
Yes	Yes		2013	04/15/2014
Yes	Yes		2013	04/15/2014

**Compliance Plan Status Report for Compliance Year 2013**  
**Summary Sheet**

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data
2010	0	0	0	0 (A)
2011	0	0	0	0 (B)
2012	0	0	0	0 (C)
<b>Baseline for 2013 Compliance Obligation</b>			2,098	(D) = AvgABC
2.00% <b>2013 Statutory Compliance Obligation</b>				
2013 Non-Solar Renewable Benchmark			1.91%	(E)
2013 Solar Renewable Benchmark			0.09%	(F)
Per ORC, 4928.64(B)(2)				
<b>2013 Compliance Obligation</b>				
Non-Solar RECs Needed for Compliance			40	(G) = (D) * (E)
Minimum Required from Ohio Facilities			20	(H) = (G) * 0.5
Solar RECs Needed for Compliance			2	(I) = (D) * (F)
Minimum Required from Ohio Facilities			1	(J) = (I) * 0.5
<b>Carry-Over from Previous Year(s), if applicable</b>				
Ohio Non-Solar - MWHs			0	(K)
Other Non-Solar - MWHs			0	(L)
Ohio Solar - MWHs			0	(M)
Other Solar - MWHs			0	(N)
<b>Total 2013 Compliance Obligations</b>				
Non-Solar RECs Needed for Compliance			40	(O) = (G) + (K) + (L)
Minimum Required from Ohio Facilities			20	(P) = (H) + (K)
Solar RECs Needed for Compliance			2	(Q) = (I) + (M) + (N)
Minimum Required from Ohio Facilities			1	(R) = (J) + (M)
<b>2013 Performance (Per GATS or MRETS Data)</b>				
Ohio Non-Solar - MWHs			20	(S)
Other Non-Solar - MWHs			20	(T)
Ohio Solar - MWHs			1	(U)
Other Solar - MWHs			1	(V)
<b>Under Compliance in 2013, if applicable</b>				
Ohio Non-Solar - MWHs			0	(W) = (P) - (S)
Other Non-Solar - MWHs			0	(X) = (O - P) - (T)
Ohio Solar - MWHs			0	(Y) = (R) - (U)
Other Solar - MWHs			0	(Z) = (Q - R) - (V)
<b>2013 Alternative Compliance Payments</b>				
Non-Solar, per MWH (Refer to Case 13-0995-EL-ACP)			\$48.56	(AA)
Solar, per MWH - per 4928.64(C)(2)(a)			\$350.00	(BB)
<b>2013 Payments, if applicable</b>				
Non-Solar Total			\$0.00	(CC) = (W+X) * (AA)
Solar Total			\$0.00	(DD) = (Y+Z) * (BB)
TOTAL			\$0.00	(EE) = (CC) + (DD)

*This compliance worksheet was developed by Staff for internal review purposes. However, it may be useful for your company in preparation of its AEPS annual compliance status report for the 2013 compliance year. Your company is not required to include this form in its filing, but that is an option. If using this form, your company should insert data in the blue shaded boxes (as applicable). The remaining cells should auto-calculate. However, you should still independently verify the accuracy of the calculations. Questions concerning this worksheet can be addressed to Stuart.Siegrfried@puc.state.oh.us*

<b>Baseline for 2013 Compliance Obligation</b>		<b>2098</b>
Projected Annual Sales Growth		3%

Year	Projected Future Baseline	Total Renewable Energy Requirement	Solar Requirement	Projected Solar RECs	Non-Solar (Renewable Reqt - Solar Reqt)	Projected Non-Solar RECs
2014	37633	2.50%	0.12%	45	2.38%	896
2015	38761.99	3.50%	0.15%	58	3.35%	1299
2016	39924.8497	4.50%	0.18%	72	4.32%	1725
2017	41122.59519	5.50%	0.22%	90	5.28%	2171
2018	42356.27305	6.50%	0.26%	110	6.24%	2643
2019	43626.96124	7.50%	0.30%	131	7.20%	3141
2020	44935.77008	8.50%	0.34%	153	8.16%	3667
2021	46283.84318	9.50%	0.38%	176	9.12%	4221
2022	47672.35847	10.50%	0.42%	200	10.08%	4805
2023	49102.52923	11.50%	0.46%	226	11.04%	5421
2024 and after	50575.6051	12.50%	0.50%	253	12.00%	6069