

FILE

RECEIVED-DOCKETING DIV

2014 MAY -6 AM 10:11

PUCO

Andrew C. Emerson
aemerson@porterwright.com

Porter Wright
Morris & Arthur LLP
41 South High Street
Suites 2800-3200
Columbus, Ohio 43215-6194

Direct: 614-227-2104
Fax: 614-227-2100
Toll free: 800-533-2794

www.porterwright.com

porterwright

CINCINNATI
CLEVELAND
COLUMBUS
DAYTON
NAPLES
WASHINGTON, DC

May 6, 2014

Ms. Barcy F. McNeal
Docketing Division
Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215

RE: Case 14-0586-EL-ACP
AEP Retail Energy Partners, LLC

Dear Ms. McNeal:

I write to withdraw the Motion for Protective Order filed on April 15, 2014. Please find a revised public version of the document attached.

Please contact me with questions.

Sincerely,



Andrew C. Emerson

Enclosures

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business
Technician AP Date Processed 5/16/14

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV

2014 MAY -6 AM 10: 11

In the Matter of AEP Retail Energy)
Partners, LLC d/b/a AEP Energy's)
Annual Alternative Energy Portfolio)
Status Report and Plan for Compliance)
with Future Annual Advanced and)
Renewable Benchmarks)

PUCO

Case No. 14-0586-EL-ACP

I. INTRODUCTION

AEP Retail Energy Partners, LLC d/b/a AEP Energy ("AEP Retail") is a competitive retail electric service ("CRES") provider, as defined in Section 4928.01(A)(4), Ohio Revised Code, and an electric services company as defined within Section 4928.01(A)(9). AEP Retail is a wholly owned subsidiary of AEP C&I Company, LLC and is an indirect subsidiary of American Electric Power, Inc. AEP Retail does not currently provide electric supply to any customers within the state of Ohio. (Certain AEP Retail customers are now being served by AEP Energy, Inc.). As such, a notice was filed with the Commission on January 17, 2014 of the intent to allow the AEP Retail certification No. 10-193E(2) to expire by operation of law on March 1, 2014.

AEP Retail hereby submits its Annual Alternative Energy Portfolio Status Report for the period January 1, 2013 through December 31, 2013, as required by Rule 4901:1-40-05 of the Ohio Administrative Code for all electric service companies. As required by the rule, this status report identifies AEP Retail's 2013 energy baseline, demonstrates its compliance with its 2013 renewable and solar energy benchmarks, and outlines its future alternative energy compliance strategy.

II. COMPLIANCE

Under Section 4928.64(B)(2) and Rule 4901:1-40-03(A)(2), for the year 2013, electric service companies must demonstrate that 2.0% of the retail electricity sold in Ohio derived from renewable energy resources. Half of that electricity must have been generated by facilities located in Ohio. In addition, electric service companies must demonstrate that 0.09% of the

retail electricity they sold derived from solar energy resources. At least half of this 0.09% requirement must have been generated by facilities located within Ohio. These benchmarks are determined by first calculating a baseline number of kilowatt hours and then applying the benchmark percentages to that baseline.

A. Initial Baseline Calculation

Rule 4901:1-40-03(B) sets forth the methodologies for calculating a baseline for compliance. As such, pursuant to Rule 4901:1-40-03(B)(2)(a), AEP Retail computes its baseline as an average of its 2010 through 2012 annual sales during which it served Ohio retail electric customers, as follows:

**TABLE 1
AEP RETAIL ENERGY PARTNERS, LLC
INITIAL BASELINE CALCULATION**

2010 MWhrs	67,093
2011 MWhrs	1,716,310
2012 MWhrs	2,964,394
Average	1,582,599

B. 2013 Renewable and Solar Energy Benchmarks

Using 1,582,599 as its 2013 baseline, AEP Retail calculates its benchmarks for electricity generated from renewable and solar energy resources for the year 2013 is as follows:

**TABLE 2
AEP RETAIL ENERGY PARTNERS, LLC
2013 RENEWABLE ENERGY BENCHMARK**

Year	Actual Load (MWhrs)	(Non-Solar) In-State	(Non-Solar) Out-of-State	Solar In-State	Solar Out-of-State
2013	21,652	15,114	15,114	712	712

C. Compliance with 2013 Renewable Energy Benchmarks

Pursuant to Section 4928.65, electric service companies may meet renewable energy benchmarks through the use of renewable energy credits ("RECs").

1. **Non-Solar, In-State:** Through the use of brokers, AEP Retail purchased sufficient RECs to satisfy its non-solar, in-state renewable requirements for 2013.
2. **Non-Solar, Out-of-State:** Acting through brokers, AEP Retail purchased sufficient RECs to satisfy its non-solar, out-of-state renewable requirements for 2013.
3. **Solar In-State:** Through the use of brokers, AEP Retail purchased sufficient RECs to satisfy its solar, in-state renewable requirements for 2013.
4. **Solar Out-of-State:** Through brokered market purchases, AEP Retail was able to satisfy its solar, out-of-state renewable requirements for 2013.

A summary of AEP Retail's compliance efforts in 2013 is as follows:

TABLE 3
AEP RETAIL ENERGY PARTNERS, LLC
2013 RENEWABLE ENERGY COMPLIANCE EFFORTS

Year	(Non-Solar) – In-State RECs Obtained	(Non-Solar) – Out-of-State RECs Obtained	Solar – In-State SRECs Obtained	Solar – Out-of-State SRECs Obtained
2013	15,114	15,114	712	712

D. AEP Retail's Compliance Strategy

AEP Retail's renewable energy compliance strategy for 2013 was to purchase RECs through market brokers. In 2012, AEP Retail Energy Partners, LLC transferred all its customers to AEP Energy, Inc., and it does not intend to offer retail electricity in Ohio as a notice was filed with the Commission on January 17, 2014 that it "intends to allow its CRES certification No. 10-193E(2) to expire by operation of law on March 1, 2014."

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

Ohio Administrative Code Rule 4901:1-40-03(C) requires all Ohio electric services companies to file an annual "plan for compliance with future annual advanced- and renewable-energy benchmarks, including solar, utilizing at least a ten-year planning horizon." In 2012,

AEP Retail Energy Partners, LLC transferred all its customers to AEP Energy, Inc., and it does not intend to offer retail electricity in Ohio as a notice was filed with the Commission on January 17, 2014 that it “intends to allow its CRES certification No. 10-193E(2) to expire by operation of law on March 1, 2014.” Thus, a ten-year planning forecast is not applicable and not included in this filing.

IV. CONCLUSION

Based on the foregoing, AEP Retail respectfully requests that the Commission find that AEP Retail has complied with the applicable renewable energy benchmarks for 2013.

Respectfully submitted,



Andrew C. Emerson
Porter Wright Morris & Arthur LLP
41 South High Street
Columbus, Ohio 43215
Tel: (614) 227-2104
Fax: (614) 227-2100
Email: aemerson@porterwright.com

Attorney for AEP Retail Energy Partners, LLC