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May 6, 2014

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

RE: Case 14-0585-EL-ACP
AEP Energy, Inc.

Dear Ms. McNeal:

On April 15, 2014, I filed a Motion for Protective Order to protect the information contained in Tables 1-4 in the AEP Energy, Inc's Annual Alternative Energy Portfolio Status Report and Plan for Compliance with Future Annual Advanced and Renewable Benchmarks. It has come to my attention that the annual sales data relevant to Tables 1-3 is public information. Thus, I write to withdraw the request for protective treatment concerning Tables 1-3. The information contained in Table 4, however, remains confidential and should be protected from public disclosure, as outlined in the memorandum in support of the protective order. Please find a revised public version of the document attached.

Please contact me with questions.

Sincerely,



Andrew C. Emerson

Enclosures

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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In the Matter of AEP Energy, Inc.'s)
Annual Alternative Energy)
Portfolio Status Report and Plan)
for Compliance with Future Annual)
Advanced and Renewable Benchmarks)

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Case No. 14-0585-EL-ACP

I. INTRODUCTION

AEP Energy, Inc. ("AEP Energy") 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 Energy is a wholly owned subsidiary of AEP C&I Company, LLC and is an indirect subsidiary of American Electric Power, Inc. AEP Energy currently provides electric supply to commercial, industrial, and residential customers within the state of Ohio.

AEP Energy 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 Energy'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. Because AEP Energy has not been continuously supplying Ohio retail electric customers during the preceding three calendar years – it had no electric sales in Ohio during 2010 and for a portion of 2011 – its baseline shall be computed as an average of annual sales data for all calendar years during the preceding three years in which it did serve retail customers. As such, pursuant to Rule 4901:1-40-03(B)(2)(a), AEP Energy computes its baseline as an average of its 2011 and 2012 annual sales during which it served Ohio retail electric customers, as follows:

**TABLE 1
AEP ENERGY, INC.
INITIAL BASELINE CALCULATION**

2010 MWhrs	0
2011 MWhrs	18,010
2012 MWhrs	1,923,599
Average	970,805

B. 2013 Renewable and Solar Energy Benchmarks

Using 970,805 as its 2013 baseline, AEP Energy calculates its benchmarks for electricity generated from renewable and solar energy resources for the year 2013 is as follows:

**TABLE 2
AEP ENERGY, INC.
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	7,390,911	9,271	9,271	437	437

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

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

**TABLE 3
AEP ENERGY, INC.
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	9,271	9,271	437	437

D. AEP Energy's Compliance Strategy

AEP Energy's renewable energy compliance strategy for 2013 was to purchase RECs through market brokers. As AEP Energy's compliance obligations increase for 2014, AEP Energy has broadened its compliance activities to include consideration of Requests for Proposals ("RFPs") and soliciting wind and solar facilities within Ohio. AEP Energy will also continue to utilize the broker market to satisfy its compliance obligation.

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.” This plan must contain at least the following four items:

- (1) Baseline for the current and future calendar years.
- (2) Supply portfolio projection, including both generation fleet and power purchases.
- (3) A description of the methodology used by the company to evaluate its compliance options.
- (4) A discussion of any perceived impediments to achieving compliance with required benchmarks, as well as suggestions for addressing any such impediments.

O.A.C. 4901:1-40-03(C)(1)-(4)

Below are the forecasted sales volumes and corresponding REC requirements for the years 2014 through 2024.

**TABLE 4
AEP ENERGY, INC.
TEN-YEAR RENEWABLE ENERGY FORECAST**

Year	Annual Load MWh	Renewable % Needed	Renewable MWh (non-Solar)	Solar % Needed	Solar MWh
2014		2.4%		0.12%	
2015		3.4%		0.15%	
2016		4.3%		0.18%	
2017		5.3%		0.22%	
2018		6.2%		0.26%	
2019		7.2%		0.30%	
2020		8.2%		0.34%	
2021		9.1%		0.38%	
2022		10.5%		0.42%	
2023		11.5%		0.46%	
2024		12.5%		0.50%	

As a CRES provider, AEP Energy does not own any electrical generation facilities. AEP Energy will continue to supply power to its customers by purchasing power through market brokers, RFPs, and third-party contracts. AEP Energy will continue to meet its alternative energy benchmarks through the purchasing of RECs and solar RECs, through the use of market brokers, RFPs, and producer contracts. Apart from generalized supply and pricing constraints, AEP Energy does not anticipate significant impediments in acquiring the RECs required to meet its alternative energy benchmarks for future years.

IV. CONCLUSION

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

Respectfully submitted,



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