

April 12, 2012

VIA FEDERAL EXPRESS Public Utilities Commission of Ohio 180 East Broad Street Columbus, Ohio 43215-3793

## RE: Certificate Number 04-118(1) issued in Case No. 04-1015-EL-CRS

# 2011 RPS COMPLIANCE PLAN AND 2011 ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT

This information is submitted by GDF SUEZ Energy Resources NA, Inc. ("GDF Suez") pursuant to Chapter 4901-40 Alternative Energy Portfolio Standards of the Ohio Administrative Code.

Enclosed, please find GDF Suez's 2011 written plan for RPS compliance and its 2011 Annual Alternative Energy Portfolio Status Report. If you require any additional information in connection with this filing, please contact me at (713) 636-1607.

Sincerely,

Naveen Rabie

Naveen Rabie Counsel

GDF SUEZ Energy Resources NA, Inc. 1990 Post Oak Boulevard, Suite 1900 Houston, TX 77056-4499 www.gdfuezenergyna.com

# COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2011

**GDF SUEZ Energy Resources NA, Inc.** (hereinafter the "CRES") in accordance with Sections 4928.64 and 4928.65, Revised Code and Commission Rules 4901:1-40-03 and 4901:1-40-05 hereby submits this Annual Alternative Energy Report ("AER") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

I. Determination that an Alternative Energy Resource Report is required.

During calendar year 2011, the CRES states that it conducted retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.

- II. Determination of the sales baseline for 2011.
  - (a) During the past three (3) calendar years, the CRES did not make retail sales generation.
  - (b) If the CRES was not active during the past three (3) calendar years, but did make sales during calendar year 2011, please project the amount of retail electric generation sales anticipated for the whole calendar year 2011 as would have been projected on the first day retail generation sales were made in Ohio.

28,375 MWh

III. Determination of the number of Solar and Total Renewable Energy Credits (RECs) required and statement of the number of RECs claimed.

	(a)	(b)	(c)	(d)
Types	No. of RECs	No. of RECs No. of RECs Registry		No. of In-State
	Required	Obtained		Qualified RECs
Solar	9	10	GATS	10
Non Solar	275	300	GATS	300
Total	284	310		310

- (a) Column (a) above represents the unadjusted number of Solar and Total RECs required for the CRES in 2011. The determinations were calculated by multiplying the baseline sales by 0.03% for Solar RECs and 1.0% for Total RECs. Total RECs include both Solar and Non Solar RECs.
- (b) The CRES states that it has obtained the number of Solar and Non Solar RECs listed in column (b) above for 2011.
- (c) The CRES used PJM GATS registry for the RECs detailed above.
- (d) The CRES states that of the RECs obtained for 2011, the number listed in column (d) above represents RECs approved as in-state qualified generation facilities according to Ohio's Alternative Energy Portfolio Standard Section 4901:1-40-03(B)(2)(9).

### IV. Compliance.

The CRES states that it has obtained the required number of Solar and Total RECs without adjustments permitted pursuant to Rule 4901:1-40-05(A)(3).

- V. Ten Year Forecast.
  - (a) In accordance with Rule 4901:1-40-03(c), the CRES hereby provides a projection for the next ten (10) years of Solar and Non Solar RECs.

The CRES began serving customers during 2011 and continues to grow and establish new customer contracts in Ohio. Because the CRES is not a standard utility with a stable customer base, it cannot accurately project load ten (10) years in advance. The competitive Ohio market and the short-term nature of retail contracts limit the CRES to a six (6) year sales forecast. Accordingly, below are forecasted sales volumes and corresponding REC requirements for the years 2012, 2013, 2014, 2015 and 2016. This forecast is based on load currently under contract rounded to the nearest 5,000 MWh.

Year	Solar RECs	Non Solar RECS	Total RECs	Forecasted MWh
2012	63	1,512	1,575	105,000
2013	122	2,578	2,700	135,000
2014	162	3,213	3,375	135,000
2015	173	3,852	4,025	115,000
2016	198	4,752	4,950	110,000

(b) Supply portfolio projection.

The CRES does not own a generation asset that can be utilized for Ohio compliance and does not carry forward Total RECs in a supply portfolio beyond the supply necessary to cover obligations for contracted loads. The CRES generally purchases Total RECs on an as needed basis.

(c) Methodology used to evaluate Compliance.

The CRES will continue to meet its alternative energy benchmarks through the purchasing of RECs and Solar RECs through the use of market brokers and through bilateral contracts with REC suppliers.

(d) Comments on perceived impediments to achieving compliance of Solar and Total REC requirements.

Apart from generalized supply and pricing constraints, the CRES does not anticipate significant impediments in acquiring the RECs required to meet its alternative energy benchmarks for future years.

VI. Conclusion.

Based on the foregoing, the CRES respectfully requests that the Commission find that the CRES has complied with the applicable renewal energy benchmarks for 2011.

I, Naveen Rabie, am the duly authorized representative of GDF SUEZ Energy Resources NA, Inc. and state to the best of my knowledge and ability, all the information contained in the foregoing Competitive Retail Electric Service Provider Alternative Energy Resource Report for Calendar Year 2011 are true, accurate and complete.

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Naveen Rabie GDF SUEZ Energy Resources NA, Inc.

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Load data in GATS might not match your actual RPS obligation NEITHER THE GATS ADMINISTRATOR NOR PJM EIS NOR THE SYSTEM OPERATOR NOR THE PJM EIS GATS PROJECT MANAGER KNOWS OR ENDORSES THE CREDITWORTHINESS OR REPUTATION OF ANY GATS ACCOUNT HOLDER LISTED IN THIS DIRECTORY	Page 1 of 1	0 0 0 0	18,954 0 233 8 225 0 233   6,475 0 233 8 25 0 233	GATS Load RPS Load Total Generation Solar Renewable Renewable S2 ClassII Total for Subaccount Energy Source Renewable Used for RPS	GDF SUEZ Energy Resources NA, Inc My RPS Compliance - OH - Jan 2011-Dec 2011

# Page 1 of 1



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Summary: Report 2011 RPS Compliance Plan & 2011 Annual AEP Status Report electronically filed by Naveen Rabie on behalf of SUEZ ENERGY RESOURCES NA, INC. and Ms. Marsha F Griffin