



Vorys, Sater, Seymour and Pease LLP
Legal Counsel

52 East Gay St.
PO Box 1008
Columbus, Ohio 43216-1008

614.464.6400 | www.vorys.com

Founded 1909

Stephen M. Howard
Direct Dial (614) 464-5401
Direct Fax (614) 719-4772
Email smhoward@vorys.com

April 15, 2015

Ms. Barcy F. McNeal, Secretary
Public Utilities Commission of Ohio
180 E. Broad St., 11th Floor
Columbus, OH 43215-3793

Re: Case No. 15-741-EL-ACP
Liberty Power Holdings, LLC
Public Version of 2014 Alternative Energy Annual Status Report

Dear Ms. McNeal:

I am submitting to you a redacted version of the Alternative Energy Annual Status Report for calendar year 2014 on behalf of Liberty Power Holdings, LLC. Certain portions of information have been redacted because they contain confidential and proprietary information. A motion for protective order is also being filed today seeking protection of such information. Pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, I will be submitting under seal two copies of the confidential version of the Alternative Energy Annual Status Report for calendar year 2014 for Liberty Power Holdings, LLC.

Thank you for your consideration.

Sincerely yours,

Stephen M. Howard
Attorneys for Liberty Power Holdings, LLC

SMH/jaw
Enclosures

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2014

Liberty Power Holdings LLC (hereinafter "CRES") in accordance with Sections 4928.64, 4928.643 and 4928.65, Ohio 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 (check one)

- ☒ During calendar year 2014 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.
- ☐ During calendar year 2014 the CRES states that it did not conduct retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio. (If this block is checked proceed to the signature line)

II. Determination of the sales baseline for 2014

The CRES will mark the applicable options below in the determination of the sales baseline for 2014.

- a. The baseline is computed as an average of the three preceding calendar years (listed below) of the total annual number of kilowatt-hours of electricity sold to any and all retail electric consumers served by the CRES in Ohio, based upon the kilowatt-hours sales in the CRES' most recent quarterly market-monitoring reports or reporting forms. That average is N/A MWh.

2011 N/A MWh
2012 N/A MWh
2013 N/A MWh

- b. The CRES has not been continuously supplying Ohio retail electric customers during the preceding three calendar years; therefore, the baseline shall be computed as an average of annual sales data for all calendar years during the preceding three years (listed below) in which the CRES was serving retail customers. That average of annual sales data for all such calendar years is 52,201 MWh.

2011 0 MWh
2012 1,705 MWh
2013 102,697 MWh

- c. The CRES had no retail electric sales in Ohio during the preceding three calendar years; therefore, its initial baseline shall consist of a reasonable projection of its retail electric sales in Ohio for a full calendar year. That reasonable projection of its retail

electric sales in Ohio for the full calendar year of 2014 is ___N/A___. Subsequent baselines shall consist of actual sales data.

- d. Beginning with compliance year 2014, a CRES may choose for its baseline the total kilowatt hours sold to any and all applicable retail consumers located in Ohio in 2014 who are served by the CRES. Such actual sales in 2014 was ___N/A___ MWh.
- e. A CRES may file an application requesting a reduced baseline to reflect new economic growth in its service territory or service area. Any such application shall include a justification including why timely compliance based on the unadjusted baseline is not feasible, a schedule for achieving compliance based on its unadjusted baseline, quantification of a new change in the rate of economic growth, and a methodology for measuring economic activity, including objective measurement parameters and quantification methodologies.

III. Determination of the number of Solar and Total Renewable Energy Credits (RECs) Required and Statement of the Number of RECs Claimed

RENEWABLE ENERGY CREDITS REQUIRED AND OBTAINED FOR 2013

Types	No. of RECs Required (a)	No. of RECs Obtained (b)	Registry (c)
Solar	63	63	PJM-GATS
Non Solar	1,242	1,242	PJM-GATS
Total	1,305	1,305	PJM-GATS

- a. Column (a) above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2014. The determinations were calculated by multiplying the Baseline Sales by 12 hundredths of one per cent (.12%) for Solar RECs and 238 hundredths percent (2.38%) for non-Solar RECS. Total RECs include both Solar and Non Solar RECs. :
- b. The CRES states that it has obtained in accordance with the Commission's Rules the number of Solar and Non Solar RECs listed in column (b) above for 2014.
- c. The CRES used the PJM GATS/M-RETS registry for the RECs detailed above.
- d. CRES states that it did not seek and did not receive a *force majeure* determination for Solar RECs.

IV. Compliance (check one)

- ☒ CRES states that it has obtained the required number of Solar RECs and Total RECs without adjustments permitted pursuant to Rule 4901:1-40-05(A)(3).
- ☐ CRES states that it has obtained the required number of Solar RECs and Total RECs after adjustments permitted pursuant to Rule 4901:1-40-05(A)(3). The type adjustment, reason for the adjustment and merit for making the requested adjustment of the proposed adjustments are detailed in an exhibit attached to this Report.

- ☐ CRES states that it is not in compliance with number of Solar RECs or Total RECs required for 2014.

V. Ten Year Forecast

a. Ten Year Forecast of Solar and Non-Solar RECs

In accordance with Rule 4901:1-40-03(C) the CRES hereby provides a projection for the next 10 years for RECs and Solar RECs.

Year	Solar RECs	Non-solar RECs	Total RECs
2015			
2016			
2017			
2018			
2019			
2020			
2021			
2022			
2023			
2024			

- b. The Supply Portfolio projection is based upon:
Current forecast of contracted sales or expected sales within the territory of OH.
- c. The Methodology used to evaluate compliance is based upon:
Multiplied the preceding three-year average load served, contracted, or forecasted by the compliance year percentage requirements.
- d. Optional comments on any perceived impediment(s) to achieving compliance with the Solar and Non Solar REC requirements, as well as any discussion addressing such impediments.
No comments.

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER

ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2014

I, Alberto Daire, am the duly authorized representative of Liberty Power Holdings LLC. To the best of my knowledge all the information contained in the foregoing report including any exhibits and attachments are true, accurate and complete.



**Compliance Plan Status Report for Compliance Year 2014
Summary Sheet**

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data	
2011	0	0	0	Settlements	(A)
2012	1,705	0	1,705	Settlements	(B)
2013	102,697	0	102,697	Settlements	(C)

Baseline for 2014 Compliance Obligation (MWHs)

52,201

(D) = AvgABC

(Note: If using 2014 sales as your baseline, insert that figure in cell I24 and indicate in box to right if 2014 sales are adjusted or not.

I.e., Not Adjusted

For details on determining your compliance baseline, please refer to 4928.643, Ohio Revised Code (ORC), and 4901:1-40-03 of the Ohio Administrative Code (OAC).

Questions may also be posed to Staff at the following email address:

AEPS@puc.state.oh.us

2.50%

2014 Statutory Compliance Obligation

2014 Non-Solar Renewable Benchmark

2.38%

(E)

2014 Solar Renewable Benchmark

0.12%

(F)

Per ORC, 4928.64(B)(2)

2014 Compliance Obligation

Non-Solar RECs Needed for Compliance

1,242

(G) = (D) * (E)

Solar RECs Needed for Compliance

63

(H) = (D) * (F)

Carry-Over from Previous Year(s), if applicable

Non-Solar (RECs)

0

(I)

Solar (S-RECs)

0

(J)

Total 2014 Compliance Obligations

Non-Solar RECs Needed for Compliance

1,242

(K) = (G) + (I)

Solar RECs Needed for Compliance

63

(L) = (H) + (J)

2014 Performance (Per GATS or MRETS Data)

Non-Solar (RECs)

1,242

(M)

Solar (S-RECs)

63

(N)

Under Compliance in 2014, if applicable

Non-Solar (RECs)

0

(O) = (K) - (M)

Solar (S-RECs)

0

(P) = (L) - (N)

2014 Alternative Compliance Payments

Non-Solar, per REC (Refer to Case 14-0746-EL-ACP)

\$49.22

(Q)

Solar, per S-REC - per 4928.64(C)(2)(a)

\$300.00

(R)

2014 Payments, if applicable

Non-Solar Total

\$0.00

(S) = (O) * (Q)

Solar Total

\$0.00

(T) = (P) * (R)

TOTAL

\$0.00

(U) = (S) + (T)

This compliance worksheet was developed by Staff for internal review purposes. However, it may be useful for your company in preparation of its RPS annual compliance status report for the 2014 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.Siegfried@puc.state.oh.us

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/15/2015 10:37:47 AM

in

Case No(s). 15-0741-EL-ACP

Summary: Report Public Version of 2014 Alternative Energy Annual Status Report
electronically filed by Mr. Stephen M Howard on behalf of Liberty Power Holdings, LLC