



Ohio Public Utility Commission  
Docketing Division  
180 East Broad Street  
Columbus, OH 43215

April 15, 2015

RE: **Docket No. 15-0729-EL-ACP – Direct Energy Services, LLC's Annual Renewable Portfolio Standards Compliance Filing for 2014**

Dear Commission:

Pursuant to RSP Rules 4901:1-40-05 OAC & 4901:1-40-03(C) OAC- regarding annual renewable portfolio standard reporting and filing, please find enclosed the executed compliance filing of Direct Energy Services, LLC.

If you should have questions regarding this filing, please do not hesitate to contact me directly.

Best Regards,

A handwritten signature in blue ink, appearing to read "Ryan Harwell", written over a light blue circular stamp.

Ryan Harwell  
Compliance Manager  
(713)877-5701  
[ryan.harwell@directenergy.com](mailto:ryan.harwell@directenergy.com)

**Direct Energy Services, LLC**  
**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	160,144	0	160,144		(A)
2012	366,208	0	366,208		(B)
2013	523,921	0	523,921		(C)
<b>Baseline for 2014 Compliance Obligation (MWHs)</b>			350,091		(D) = AvgABC
2.50%	<b>2014 Statutory Compliance Obligation</b>				
	2014 Non-Solar Renewable Benchmark				
	2014 Solar Renewable Benchmark				
	Per ORC, 4928.64(B)(2)				
	<b>2014 Compliance Obligation</b>				
	Non-Solar RECs Needed for Compliance				
	Solar RECs Needed for Compliance				
	<b>Carry-Over from Previous Year(s), if applicable</b>				
	Non-Solar (RECs)				
	Solar (S-RECs)				
	<b>Total 2014 Compliance Obligations</b>				
	Non-Solar RECs Needed for Compliance				
	Solar RECs Needed for Compliance				
	<b>2014 Performance (Per GATS or MRETS Data)</b>				
	Non-Solar (RECs)				
	Solar (S-RECs)				
	<b>Under Compliance in 2014, If applicable</b>				
	Non-Solar (RECs)				
	Solar (S-RECs)				
	<b>2014 Alternative Compliance Payments</b>				
	Non-Solar, per REC (Refer to Case 14-0746-EL-ACP)				
	Solar, per S-REC - per 4928.64(C)(2)(a)				
	<b>2014 Payments, if applicable</b>				
	Non-Solar Total				
	Solar Total				
	TOTAL				

*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*

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

Direct Energy Services, LLC (hereinafter "DES") in accordance with Sections 4928.64 and 4928.65, Ohio Revised Code and Commission Rules 4901:1-40-03 and 4901:1-40-05 hereby submits this Alternative Energy Annual Status Report ("AER") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

1. 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.

2. Determination of the sales baseline for 2014

- a. During the past three calendar years the CRES made retail sales of generation in the amounts shown below:

2011 MWh	160,144
2012 MWh	366,208
2013 MWh	523,921

- b. The average annual sales of the active years listed above (sum of the active years' MWh / number of active years hereinafter "Baseline Sales")

350,091

- c. If conditions exist that merit an adjustment to the Baseline Sales please list the adjusted Baseline Sales and attach as an exhibit to this AER a full explanation of the reason(s) for the adjustment(s).

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- d. If the CRES was not active during calendar years 2011, 2012, and 2013 but did make sales during calendar year 2014, please project the amount of retail electric generation sales anticipated for the whole of calendar year 2014 as would have been projected on the first day retail generation sales were made in Ohio.

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3. 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 2014				
Types	(A) No. of RECs Required	(B) No. of RECs Obtained	(C) Registry	(D) No. of RECs Sited in OH
Solar	420	420	GATS	420
Non Solar	8,332	8,332	GATS	8,332
Total	8,752	8,752	GATS	8,752

- 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:

<input checked="" type="checkbox"/>	Baseline Sales
<input type="checkbox"/>	Adjusted Baseline Sales
<input type="checkbox"/>	Projected Sales

by 12 hundredths of one per cent (.12%) for Solar RECs, by two and 38 hundredths percent (2.38%) for Non-Solar RECs, and two and a half percent (2.5%) for total 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.

Approved registry being used by the CRES: PJM-GATS

- c. The CRES states that of the RECs it has obtained for 2014 the number listed in column D represents the RECs with generation facilities sited within the state of Ohio.

CRES states that it has

<input type="checkbox"/>	Received a force majeure determination for solar RECs
<input type="checkbox"/>	Sought but has yet to receive a ruling on a force majeure determination for Solar RECs
<input checked="" type="checkbox"/>	Did not seek and did not receive a force majeure determination for solar RECs

4. Compliance (check one)

<input checked="checked" type="checkbox"/>	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).
<input type="checkbox"/>	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).
<input type="checkbox"/>	CRES states that it is not in compliance with number of Solar RECs or total RECs required for 2014.

5. 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.

This section redacted due to confidential information contained.

10 Year Forecast of Solar and Non-Solar RECs							
Year	Estimated Sales	Estimated Solar	Estimated Non-Solar	Estimated Total RECs			
2015							
2016							
2017							
2018							
2019							
2020							
2021							
2022							
2023							
2024							

This section redacted due to confidential information contained.

b. Supply Portfolio projection:

[Redacted]


This section redacted due to confidential information contained.

c. Methodology used to evaluate compliance:

[Redacted]

- d. 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. N/A

I, Bray Dohrwardt, am the duly authorized representative of Direct Energy Services, and state, to the best of my knowledge and ability, all the information contained in the foregoing Competitive Retail Electric Service Provider Alternative Energy Annual Status Report for Calendar Year 2014, including any exhibits and attachments, are true, accurate and complete.

  
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Signature

**Name** Bray Dohrwardt  
**Title** Vice President & Secretary  
**Company** Direct Energy Services, LLC

## Energy America, LLC - Reserve Subaccount Details - OH - Jan 2014 - Dec 2014

Subaccount Name	Zone Name	Month/ Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number
Default	AEP	09/2013	NON68980	West Jefferson High School - 12-3321-EL-REN	OH	SUN	813909 - 1 to 60	60	13-SPV-OH-GATS-0092
Default	AEP	11/2011	MSET89634101	Belleville - 1	WV	WAT	313787 - 14000 to 15179	1,180	10-HYD-WV-GATS-0040
Default	DAY	09/2013	NON68980	West Jefferson High School - 12-3321-EL-REN	OH	SUN	813909 - 61 to 72	12	13-SPV-OH-GATS-0092
Default	DAY	11/2011	MSET89634101	Belleville - 1	WV	WAT	313787 - 15180 to 15408	229	10-HYD-WV-GATS-0040
Default	DEOK	09/2013	NON68980	West Jefferson High School - 12-3321-EL-REN	OH	SUN	813909 - 73 to 131	59	13-SPV-OH-GATS-0092
Default	DEOK	07/2013	NON68980	West Jefferson High School - 12-3321-EL-REN	OH	SUN	762052 - 1 to 131	131	13-SPV-OH-GATS-0092
Default	DEOK	08/2013	NON68980	West Jefferson High School - 12-3321-EL-REN	OH	SUN	778337 - 1 to 138	138	13-SPV-OH-GATS-0092
Default	DEOK	07/2013	NON68990	Gahanna Lincoln High School - 12-3205-EL-REN	OH	SUN	762403 - 92 to 111	20	13-SPV-OH-GATS-0105
Default	DEOK	10/2011	MSET89634101	Belleville - 1	WV	WAT	299196 - 14804 to 16483	1,680	10-HYD-WV-GATS-0040
Default	DEOK	11/2011	MSET89634101	Belleville - 1	WV	WAT	313787 - 15409 to 20651	5,243	10-HYD-WV-GATS-0040



# Energy America, LLC - My RPS Compliance - OH - Jan 2014 - Dec 2014

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Delete	Total Generation for Subaccount	Solar Renewable Energy Source	Renewable Energy Source	Total Certificates Used for RPS
Energy America, LLC Default	AEP		249,061			1,240	60	1,180	1,240
Energy America, LLC Default	ATSI		81,674			0	0	0	0
Energy America, LLC Default	DAY		548,770			241	12	229	241
Energy America, LLC Default	DEOK		389,344			7,271	348	6,923	7,271
Energy America, LLC Reserve Subaccount			0			0	0	0	0
Total			1,268,849			8,752	420	8,332	8,752

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

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**in**

**Case No(s). 15-0729-EL-ACP**

Summary: Report Annual Renewable Portfolio Standards Compliance Filing 2014  
electronically filed by Mr. Ryan D Harwell on behalf of Direct Energy Services, LLC