# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of The Dayton Power and Light	)	Case No. 15-0171-EL-ACP
Company's Annual Alternative Energy	)	
Portfolio Status Report	)	

# THE DAYTON POWER AND LIGHT COMPANY'S ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT AND TEN YEAR RENEWABLE ENERGY BENCHMARK COMPLIANCE PLAN

Pursuant to Sections 4901:1-40-05(A)(1) and 4901:1-40-03(C) of the Ohio Administrative Code, the Dayton Power and Light Company hereby submits the attached Alternative Energy Portfolio Status Report and Ten Year Renewable Energy Benchmark Compliance Plan for calendar year 2014.

Respectfully submitted,

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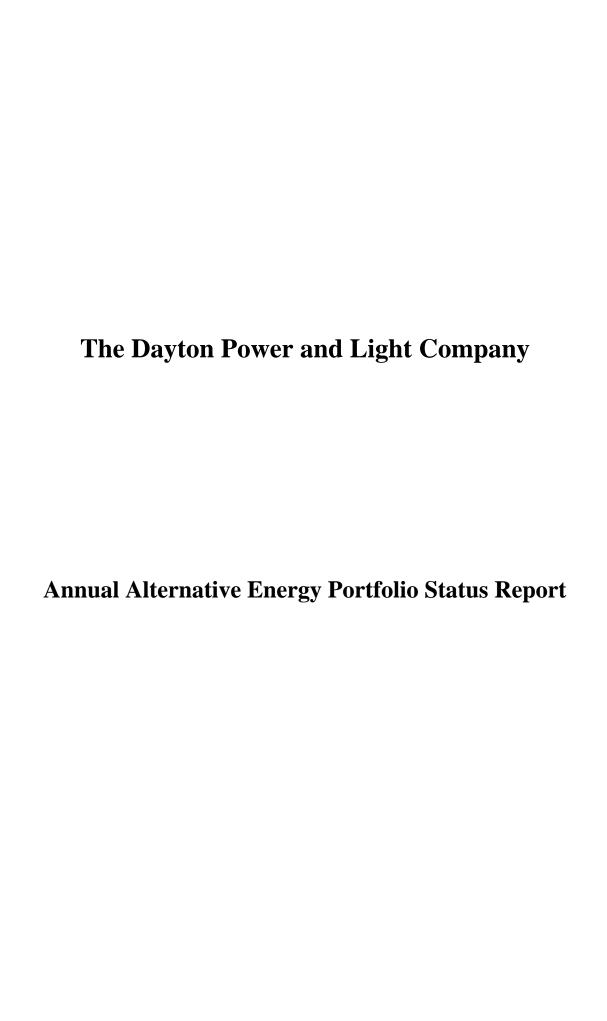
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Pursuant to Ohio Administrative Code (OAC) Section 4901:1-40-05(A)(1), the Dayton Power and Light Company (DP&L or the Company) hereby submits its Alternative Energy Portfolio Status Report for calendar year 2014. DP&L is an electric distribution utility as defined by Ohio Revised Code (ORC) Section 4928.01(A)(6) and is therefore subject to the renewable benchmarks contained in ORC §4928.64. The purpose of this report is to provide the Public Utilities Commission of Ohio (PUCO), as well as all interested parties, an understanding as to how the Company met its 2014 Renewable and Solar Energy Benchmarks.

#### 2014 Benchmarks

Pursuant to ORC §4928.643, the 2014 Baseline Sales level was computed using the Company's standard offer sales experienced in the applicable compliance year. The Renewable Energy Resource Benchmark and the Solar Energy Resource Benchmark were calculated based on that Baseline Sales level multiplied against the percentage Benchmarks set forth in ORC §4928.64.

	(A)	(B)	(C)	
Line	Description	MWh Sales	Source	
1	Baseline (2014 Sales)	4,038,806	Internal Records	
2	2014 Statutory Compliance Obligation		_	
3	Renewable Energy Resource Benchmark	2.50%	ORC 4928.64(B)(2)	
4	Solar Energy Resource Benchmark	0.12%	ORC 4928.64(B)(2)	
5	2014 Compliance Obligation			
6	Non-Solar RECs Needed for Compliance	96,124	(Line 3 * Line 1) - Line 7	
7	Solar RECs Needed for Compliance	4,847	Line 4 * Line 1	
8	RECs Acquired for Compliance Year 2014		1	
9	Acquired Non-Solar RECs	96,124	Internal Records	
10	Acquired Solar RECs	4,847	Internal Records	

### **2014 Status Report**

As shown in the above table, DP&L met each of the Benchmarks for 2014. Pursuant to ORC §4928.645, RECs that were purchased by the Company are usable within a five-year period. Any RECs held by DP&L in excess of its 2014 Benchmarks will be applied to future year benchmarks.

#### **2014** Activities

Consistent with DP&L's initial renewable compliance plan approved by Commission order dated June 24, 2009 in the context of DP&L's Electric Security Plan (ESP) (Case No. 08-1094-EL-SSO), DP&L satisfied its 2014 renewable energy requirements through the purchase of RECs. Specifically, DP&L worked with brokers who are active daily in trying to find willing buyers and sellers of renewable energy and/or associated RECs. DP&L also made direct purchases from renewable generation owners of RECs.

#### **Conclusion**

As demonstrated above, DP&L met each of the 2014 Renewable Benchmarks established by Ohio SB 221.

## **The Dayton Power and Light Company**

Renewable Energy Benchmark

10 Year Compliance Plan

Dated: April 15, 2015

Pursuant to Ohio Administrative Code (OAC) Section 4901:1-40-03(C), the Dayton Power and Light Company (DP&L or the Company) hereby submits its ten year renewable energy benchmark compliance plan. DP&L is an electric distribution utility as defined by Ohio Revised Code (ORC) Section 4928.01(A)(6) and is therefore subject to the renewable benchmarks contained in ORC §4928.64. The purpose of this plan is to provide the Public Utilities Commission of Ohio (PUCO), as well as all interested parties, an understanding as to how the Company plans to achieve those benchmarks.

#### Baseline

ORC §4928.643 specifies that the distribution utility's Renewable Energy Benchmarks must be based on sales made to standard offer retail customers in either the last three years, or the utility may choose for its baseline to be the total kilowatt hours sold in the applicable compliance year.

For the purpose of developing the benchmarks for the next 10 years, DP&L had to develop a forecast of standard offer sales. DP&L's forecast is based upon the Company's recorded standard offer sales through December 31, 2014. The Company has assumed those that were shopping as of that date will continue to shop.

The chart below shows DP&L's renewable energy and solar benchmarks for the next ten years consistent with the methodology discussed above.

DP&L's Forecasted 10 Year Retail Sales and Renewable Requirements

	DP&L's Annual Baseline SB 221 Requirement*	SB 221 Compliance Requirement %		Renewable Requirement	Solar Requirement
Year	MWh	Renewable Energy Resource	Solar Energy Resource	Total MWh	Total MWh
2014	4,038,806	2.50%	0.12%	96,124	4,847
2015	4,038,806	2.50%	0.12%	96,124	4,847
2016	4,038,806	2.50%	0.12%	96,124	4,847
2017	4,038,806	3.50%	0.15%	135,300	6,058
2018	4,038,806	4.50%	0.18%	174,476	7,270
2019	4,038,806	5.50%	0.22%	213,249	8,885
2020	4,038,806	6.50%	0.26%	252,021	10,501
2021	4,038,806	7.50%	0.30%	290,794	12,116
2022	4,038,806	8.50%	0.34%	329,567	13,732
2023	4,038,806	9.50%	0.38%	368,339	15,347

#### **Assumptions**

## **Compliance Plan**

DP&L filed its initial renewable compliance plan in its Electric Security Plan (ESP) (Case No. 08-1094-EL-SSO) in October 2008. That plan was approved by Commission order dated June 24, 2009. That plan called for the purchase of Renewable Energy Credits (RECs) in the near-term combined with potential DP&L renewable generation and additional REC purchases in the mid- to longer-term. DP&L's annual 10 year compliance plans continued to support the original plan.

On October 5, 2012, DP&L filed an application seeking to implement an Electric Security Plan in PUCO Case Nos. 12-426-EL-SSO, et al. On page 3 of the application, DP&L proposed the following:

9. During the ESP period, DP&L will continue to meet the alternative energy requirements of Ohio Rev. Code §4928.64 for the SSO load in its service territory in the same way that it does currently, through purchase of Renewable Energy Credits ("RECs") or through the use of the RECs generated by the Yankee solar generation

<sup>\*</sup> Baseline SB 221 Requirements are based on average MWh standard offer sales from either the preceding three calendar years or the applicable compliance year. Requirements beyond 2014 are forecasted assuming annual sales in year 2015 and later are recorded at 2014 levels, and are subject to change.

facility. Renewable compliance costs will continue to be recovered through DP&L's Alternative Energy Rider much like it is today. This rider will be modified to be trued-up on a seasonal quarterly basis.

DP&L's ESP Application was approved on September 4, 2013.

#### **Non-Solar Renewable Benchmarks**

Consistent with DP&L's approved renewable plan and for the short-term, DP&L continues to expect to meet the Non-Solar Renewable Benchmarks through the purchase of RECs. In the longer-term, DP&L may explore meeting its Non-Solar Benchmarks through REC purchases and, where feasible, deliverable and economically beneficial, through the purchase of both electricity and associated RECs from renewable facilities.

#### **Solar Renewable Benchmarks**

DP&L plans to meet its Ohio Solar Benchmarks by purchasing RECs and by self-generating at our 1.1MW Yankee Solar Generating Facility (Yankee Solar) which became operational on March 24, 2010. DP&L will continue to dedicate RECs generated by Yankee Solar to SSO customers until the asset is divested as Ordered in the ESP Case (PUCO Case No. 12-426-EL-SSO). Additionally, when determined to be economically beneficial, the Company may consider Power Purchase Agreements (PPAs). In the longer-term, compliance will be through a combination of REC purchases and, where feasible, deliverable and economically beneficial, through the purchase of electricity and associated RECs from renewable facilities.

#### Conclusion

DP&L will continue its efforts to meet the Renewable Energy Benchmarks in the most cost-effective means possible for its ratepayers. The Company actively monitors REC markets and emerging technologies and continuously evaluates its compliance plans as new information or new projects are introduced or completed.

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 15-0171-EL-ACP

Summary: Report In the matter of The Dayton Power and Light Company's Annual Alternative Energy Portfolio Status Report and Ten Year Renewable Energy Benchmark Compliance Plan electronically filed by Eric R Brown on behalf of The Dayton Power and Light Company