



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

September 16, 2015

RE: **Amended filing for Docket No. 15-0728-EL-ACP – Direct Energy Business Marketing, LLC's Annual Renewable Portfolio Standards Compliance Filing for 2014**

Dear Commission:

Please accept the amended Annual Renewable Portfolio Standards Compliance Filing on Behalf of Direct Energy Business Marketing, LLC.

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 Business Marketing, LLC.

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

Best Regards,

Barbara Farmer
Compliance Analyst
(713)354-4710
barbara.farmer@directenergy.com

Compliance Plan Status Report for Compliance Year 2014

Summary Sheet

Direct Energy Business Marketing, LLC

| | Sales Unadjusted (MWHs) | Proposed Adjustments (MWHs) | Sales Adjusted (MWHs) | Source of Sales Volume Data | |
|------|----------------------------|--------------------------------|--------------------------|--------------------------------|-----|
| 2011 | 0 | 0 | | | (A) |
| 2012 | 0 | 0 | | | (B) |
| 2013 | 0 | 0 | | | (C) |

Baseline for 2014 Compliance Obligation (MWHs)

560,522

(D) = AvgABC

(Note: If using 2014 sales as your baseline, insert that figure in cell I14 and indicate in box to right if 2014 sales are adjusted or not.

Not adjusted

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

13,340

(G) = (D) * (E)

Solar RECs Needed for Compliance

673

(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

13,340

(K) = (G) + (I)

Solar RECs Needed for Compliance

673

(L) = (H) + (J)

2014 Performance (Per GATS or MRETS Data)

Non-Solar (RECs)

13,340

(M)

Solar (S-RECs)

673

(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

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

Direct Energy Business Marketing, LLC (hereinafter "DEBM") 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 | 0 |
| 2012 MWh | 0 |
| 2013 MWh | 0 |

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

0

- 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).

560,522

- 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.

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 | 673 | 673 | GATS | 116 |
| Non Solar | 13,340 | 13,340 | GATS | 0 |
| Total | 14,013 | 14,013 | GATS | 255 |

- 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 type="checkbox"/> | Baseline Sales |
| <input checked="" 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="" 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:

c. Methodology used to evaluate compliance:

- 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 Business Marketing, LLC, 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.

Signature

Bray Dohrwardt
Secretary, Direct Energy Business Marketing, LLC

The electricity portion of Hess Corporation was sold to Direct Energy at the end of 2013. In 2014 we transferred all of our customers from the Hess license to the new Direct Energy Business Marketing license. While we have filed for Hess using all of the older contracts and their load, this filing is using all of the newer contracts. We are using 2014 as our baseline since it the only year that we have load for.

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). 15-0728-EL-ACP

Summary: Report Revised Annual Renewable Portfolio Standards Compliance Filing for 2014. electronically filed by Mr. Ryan D Harwell on behalf of Direct Energy Business Marketing, LLC and Ms. Barbara Farmer