



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 4, 2016

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

Re: Case No. 16-712-EL-ACP
Commerce Energy of Ohio, Inc. d/b/a Just Energy
Public Version

Dear Ms. McNeal:

I am filing a redacted version of the Alternative Energy Compliance Report for Calendar Year 2015 for Commerce Energy of Ohio, Inc. d/b/a Just Energy. This report is redacted because it contains certain confidential and proprietary information. Pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, a motion for protective order has been filed and two copies of the confidential version of this report are being submitted under seal.

Thank you for your consideration.

Sincerely yours,

Stephen M. Howard
Attorneys for Commerce Energy of Ohio, Inc. d/b/a
Just Energy

SMH/jaw
Enclosure

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
RENEWABLE PORTFOLIO STANDARD (RPS) REPORT FOR CALENDAR YEAR 2015

Commerce Energy of Ohio, Inc. D/B/A Just Energy (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 RPS Report detailing compliance with the Ohio Renewable Portfolio Standards.

Check this box if applicable:

- ☐ This RPS Report also addresses the compliance obligations of an additional CRES provider, _____.

I. Determination that an Alternative Energy Resource Report is Required (check one)

- ☒ During calendar year 2015 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 2015 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 2015

The CRES will mark only one of the applicable options below in the determination of the sales baseline for 2015.

- 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 220,945 MWh.

2012	<u>50,566</u> MWh
2013	<u>237,807</u> MWh
2014	<u>374,462</u> 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 _____.

2012	_____ MWh
2013	_____ MWh
2014	_____ MWh

- c. Beginning with compliance year 2014, a CRES may choose for its baseline the total kilowatt hours sold during the compliance year to any and all applicable retail

consumers located in Ohio who are served by the CRES. Such actual sales in 2015 was _____ MWh.

- d. 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 RETIRED FOR 2015

Types	No. of RECs Required (a)	No. of RECs Retired (b)	Registry (c)
Solar	265	265	PJM-GATS
Non Solar	5,258	5,257	PJM-GATS
Total	5,523	5,523	PJM-GATS

- a. Column (a) above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2015. 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 retired in accordance with the Commission's Rules the number of Solar and Non Solar RECs listed in column (b) above for 2015.
- c. The CRES used the PJM GATS and/or M-RETS registry as listed in column (c) 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 retired 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 retired 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 2015.

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
2016			
2017			
2018			
2019			
2020			
2021			
2022			
2023			
2024			
2025			

- b. The Supply Portfolio projection is based upon:
Just Energy purchases supply based on short-term annual contracts.
- c. The Methodology used to evaluate compliance is based upon:
Just Energy is not developing and does not own any renewable generation that would qualify under the Ohio RPS program. Instead, Just Energy purchases renewable energy under third-party contractual agreements to meet its RPS procurement obligations. Just Energy will purchase renewable energy on an annual basis based on projected sales, hedging against risks with other procurement options. This procurement process will account for the various portfolio content category requirements and will insure that Just Energy has sufficient procurement from each portfolio content category to satisfy the requirements in accordance with Ohio law (Revised Code Section 4928.64). After the end of each year and each compliance period, Just Energy will true up its purchases and re-evaluate its retail sales data, to help ensure it will purchase and procure sufficient renewable energy to meet its sales data, to help ensure it will purchase and procure sufficient renewable energy to meet its RPS procurement and portfolio content category 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.
Just Energy obtained all the required RECs for the 2014 reporting period.

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
RENEWABLE PORTFOLIO STANDARD (RPS) REPORT FOR CALENDAR YEAR 2015

I, Krishnan Kasiviswanathan, am the duly authorized representative of Commerce Energy of Ohio, Inc. D/B/A Just Energy, 6345 Dixie Rd. Suite 200, Mississauga, Ontario, Canada. To the best of my knowledge all the information contained in the foregoing report including any exhibits and attachments are true, accurate and complete.

K. Kasiviswanathan
Signature

Krishnan Kasiviswanathan
Sr. Vice President, Supply and Strategic Development
Commerce Energy of Ohio, Inc.

Any questions from the Commission Staff regarding this report should be directed to:

David Clough at 281-409-1589 or
Name Phone Number

dclough@justenergy.com
E-Mail Address

Approved
By
Legal

CSK

Compliance Plan Status Report for Compliance Year 2015
Summary Sheet

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data
2012	50,566	0	50,566	PUCO Annual Report (A)
2013	237,807	0	237,807	PUCO Annual Report (B)
2014	374,462	0	374,462	PUCO Annual Report (C)

Baseline for 2015 Compliance Obligation (MWHs)

220,945

(D) = AvgABC

(Note: If using 2015 sales as your baseline, insert that figure in cell I14 and indicate in box to right if 2015 sales are adjusted or not.

i.e., Not Adjusted

2.50%

2015 Statutory Compliance Obligation

2015 Non-Solar Renewable Benchmark

2.38%

(E)

2015 Solar Renewable Benchmark

0.12%

(F)

Per R.C., 4928.64(B)(2)

2015 Compliance Obligation

Non-Solar RECs Needed for Compliance

5,258

(G) = (D) * (E)

Solar RECs Needed for Compliance

265

(H) = (D) * (F)

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

Non-Solar (RECs)

0

(I)

Solar (S-RECs)

0

(J)

Total 2015 Compliance Obligations

Non-Solar RECs Needed for Compliance

5,258

(K) = (G) + (I)

Solar RECs Needed for Compliance

265

(L) = (H) + (J)

2015 Performance (Per GATS and/or MRETS Data)

Non-Solar (RECs)

5,258

(M)

Solar (S-RECs)

265

(N)

Under Compliance in 2015, if applicable

Non-Solar (RECs)

0

(O) = (K) - (M)

Solar (S-RECs)

0

(P) = (L) - (N)

2015 Alternative Compliance Payments

Non-Solar, per REC (Refer to Case 15-0461-EL-ACP)

\$49.96

(Q)

Solar, per S-REC (Refer to R.C. 4928.64(C)(2)(a))

\$300.00

(R)

2015 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 2015 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

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

Commerce Energy, Inc. – Subaccount Details – OH –
Jan 2015 – Dec 2015

Subaccount	Zone	Name	Month/ Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Numl	Solar Renewable	RPS	RPS Price	RPS Period	Deposit Date
Default	AEF Ohio	TMI PHOENIX - TMI PHOENIX	5/1/2013	NON40357	TMI PHOENIX - TMI PHOENIX	OH	SUN	678166 - 1 to 2	2	10-SPV-OH-GATS-0033	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	TMI PHOENIX - TMI PHOENIX	6/1/2013	NON40357	TMI PHOENIX - TMI PHOENIX	OH	SUN	708938 - 1 to 1	1	10-SPV-OH-GATS-0033	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	TMI PHOENIX - TMI PHOENIX	11/1/2013	NON40357	TMI PHOENIX - TMI PHOENIX	OH	SUN	745134 - 2 to 2	1	10-SPV-OH-GATS-0033	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	Untours - Untours	11/1/2013	NON42561	Untours - Untours	PA	SUN	850830 - 1 to 2	2	10-SPV-PA-GATS-0569	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Untours - Untours	12/1/2013	NON42581	Untours - Untours	PA	SUN	881550 - 1 to 1	1	10-SPV-PA-GATS-0569	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Zimmerli - Zimmerli	11/1/2013	NON40885	Zimmerli - Zimmerli	PA	SUN	859786 - 1 to 1	1	10-SPV-PA-GATS-0738	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	West - West	11/1/2013	NON42199	West - West	PA	SUN	850723 - 1 to 1	1	10-SPV-PA-GATS-0738	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Withrow, James Residence	8/1/2013	NON50881	Withrow, James Residence	OH	SUN	761596 - 1 to 2	2	11-SPV-OH-GATS-1208	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	Withrow, James Residence - Withrow, James Residence	8/1/2013	NON50881	Withrow, James Residence - Withrow, James Residence	OH	SUN	765537 - 1 to 1	1	11-SPV-OH-GATS-1208	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	University Hospitals Ahuja - Ahuja	11/1/2013	NON57330	University Hospitals Ahuja - Ahuja	OH	SUN	861486 - 1 to 2	2	11-SPV-OH-GATS-1222	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	BASD Buchanan Solar - BASD Buchanan Solar	6/1/2013	NON50029	BASD Buchanan Solar - BASD Buchanan Solar	PA	SUN	688702 - 1 to 36	36	11-SPV-PA-GATS-1250	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	BASD Buchanan Solar - BASD Buchanan Solar	6/1/2013	NON50029	BASD Buchanan Solar - BASD Buchanan Solar	PA	SUN	715215 - 1 to 36	36	11-SPV-PA-GATS-1250	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	BASD Spring Garden Solar - BASD Spring Garden Solar	5/1/2013	NON50237	BASD Spring Garden Solar - BASD Spring Garden Solar	PA	SUN	714358 - 1 to 32	32	11-SPV-PA-GATS-1251	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	BASD Spring Garden Solar - BASD Spring Garden Solar	5/1/2013	NON50237	BASD Spring Garden Solar - BASD Spring Garden Solar	PA	SUN	683813 - 1 to 39	39	11-SPV-PA-GATS-1251	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	BASD East Hills Solar - BASD East Hills Solar	5/1/2013	NON50030	BASD East Hills Solar - BASD East Hills Solar	PA	SUN	683703 - 1 to 42	42	11-SPV-PA-GATS-1252	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	BASD East Hills Solar - BASD East Hills Solar	6/1/2013	NON50030	BASD East Hills Solar - BASD East Hills Solar	PA	SUN	724513 - 1 to 40	40	11-SPV-PA-GATS-1252	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Weaver-Tim PA-PV - Weaver-Tim PA-PV	10/1/2013	NON50747	Weaver-Tim PA-PV - Weaver-Tim PA-PV	PA	SUN	849300 - 1 to 1	1	11-SPV-PA-GATS-2110	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	7/1/2013	NON53972	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	PA	SUN	849096 - 1 to 2	2	11-SPV-PA-GATS-2756	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	7/1/2013	NON53972	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	PA	SUN	845318 - 1 to 1	1	11-SPV-PA-GATS-2756	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	9/1/2013	NON53972	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	PA	SUN	846824 - 1 to 1	1	11-SPV-PA-GATS-2756	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	10/1/2013	NON53972	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	PA	SUN	849495 - 1 to 1	1	11-SPV-PA-GATS-2756	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	8/1/2013	NON53972	Wagner-Warren-PA-PV-10.12KW Residence - Wagner-Warren-PA-PV-10.12KW Residence	PA	SUN	845913 - 1 to 1	1	11-SPV-PA-GATS-2756	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Trickner-William-PA-PV-9.54KW Residence - Trickner-William-PA-PV-9.54KW Residence	10/1/2013	NON54813	Trickner-William-PA-PV-9.54KW Residence - Trickner-William-PA-PV-9.54KW Residence	PA	SUN	849240 - 1 to 1	1	11-SPV-PA-GATS-2843	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	Valsak, Dave Residence - Valsak, Dave Residence	8/1/2013	NON5633	Valsak, Dave Residence - Valsak, Dave Residence	OH	SUN	793068 - 1 to 1	1	12-SPV-OH-GATS-0466	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	Valsak, Dave Residence - Valsak, Dave Residence	7/1/2013	NON5633	Valsak, Dave Residence - Valsak, Dave Residence	OH	SUN	791012 - 1 to 1	1	12-SPV-OH-GATS-0466	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	ESS 1501 - Cincinnati, OH	12/1/2013	NON65798	ESS 1501 - Cincinnati, OH	OH	SUN	887459 - 1 to 2	2	12-SPV-OH-GATS-1209	Yes	Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	ESS 1506 - Lebanon, OH	12/1/2013	NON65798	ESS 1506 - Lebanon, OH	OH	SUN	885689 - 1 to 1	1	12-SPV-OH-GATS-1214	Yes	Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	Williams, Jack Residence - Williams, Jack Residence	8/1/2013	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	771950 - 1 to 2	2	12-SPV-OH-GATS-1309	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	Williams, Jack Residence - Williams, Jack Residence	7/1/2013	NON66436	Williams, Jack Residence - Williams, Jack Residence	OH	SUN	762103 - 1 to 1	1	12-SPV-OH-GATS-1309	Yes	Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	ESS 1508 - Xenia, OH	12/1/2013	NON66250	ESS 1508 - Xenia, OH	OH	SUN	883915 - 1 to 1	1	12-SPV-OH-GATS-1328	Yes	Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	ESS 1509 - Sidney, OH	12/1/2013	NON66252	ESS 1509 - Sidney, OH	OH	SUN	883915 - 1 to 1	1	12-SPV-OH-GATS-1329	Yes	Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	ESS 1511 - Greenville, OH	12/1/2013	NON66254	ESS 1511 - Greenville, OH	OH	SUN	882415 - 1 to 1	1	12-SPV-OH-GATS-1331	Yes	Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	ESS 1513 - Greenville, OH	11/1/2013	NON66254	ESS 1513 - Greenville, OH	OH	SUN	852602 - 1 to 2	2	12-SPV-OH-GATS-1331	Yes	Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	ESS 1512 - Washington Courts, OH	12/1/2013	NON66257	ESS 1512 - Washington Courts, OH	OH	SUN	878294 - 1 to 1	1	12-SPV-OH-GATS-1332	Yes	Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	United Sports - United Sports	8/1/2013	NON66215	United Sports - United Sports	PA	SUN	771917 - 1 to 18	18	13-SPV-PA-GATS-0005	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	United Sports - United Sports	11/1/2013	NON66215	United Sports - United Sports	PA	SUN	851052 - 1 to 6	6	13-SPV-PA-GATS-0005	Yes	Yes	\$65.00	2015	3/16/2016
Default	AEF Ohio	MSET543129C FE LOHAIN 1 LF - 1	11/1/2013	MSET543129C	FE LOHAIN 1 LF - 1	OH	LFG	855967 - 1886 to 1987	102	09-BIO-OH-GATS-0013	Yes	Yes	\$14.00	2015	3/16/2016
Default	AEF Ohio	MSET895041C AEP SUMMERVILLE 1.2 H - 1	11/1/2012	MSET895041C	AEP SUMMERVILLE 1.2 H - 1	WV	WAT	345967 - 8583 to 12738	4,156	09-HYD-WV-GATS-0082	Yes	Yes	\$14.00	2015	3/16/2016
Default	AEF Ohio	PH Glatfelter - Chillicothe - T10-T13	11/1/2012	NON34059	PH Glatfelter - Chillicothe - T10-T13	OH	WDS	549737 - 1 to 1000	1,000	11-BIO-OH-GATS-0187	Yes	Yes	\$8.00	2015	3/16/2016

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/4/2016 9:25:49 AM

in

Case No(s). 16-0712-EL-ACP

Summary: Report Public Version - Alternative Energy Compliance Report for Calendar Year 2015 electronically filed by Mr. Stephen M Howard on behalf of Commerce Energy of Ohio, Inc. d/b/a Just Energy