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April 4, 2016

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

Re: Case No. 16-713-EL-ACP  
Hudson Energy Services, LLC  
Public Version

Dear Ms. McNeal:

I am filing a redacted version of the Alternative Energy Compliance Report for Calendar Year 2015 for Hudson Energy Services, LLC. 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 Hudson Energy Services, LLC

SMH/jaw  
Enclosure

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

Hudson Energy Services, 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 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 \_\_\_\_\_ MWh.

2012	_____	MWh
2013	_____	MWh
2014	_____	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 35,127.

2012	_____	MWh
2013	<u>11,795</u>	MWh
2014	<u>58,460</u>	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	42	42	PJM-GATS
Non Solar	836	836	PJM-GATS
Total	878	878	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:  
Hudson Energy purchases supply based on short-term annual contracts.
- c. The Methodology used to evaluate compliance is based upon:  
Hudson 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.  
Hudson 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 Hudson Energy Services, LLC, 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.



Signature

Krishnan Kasiviswanathan  
Sr. Vice President, Supply and Strategic Development  
Hudson Energy Services, LLC

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

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

dclough@iustenergy.com  
E-Mail Address

Approved  
By  
Legal



**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	0	0	0	PUCO Annual Report	(A)
2013	11,795	0	11,795	PUCO Annual Report	(B)
2014	58,460	0	58,460	PUCO Annual Report	(C)

Baseline for 2015 Compliance Obligation (MWhs)

35,127

(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

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%

2015 Statutory Compliance Obligation

2015 Non-Solar Renewable Benchmark

2015 Solar Renewable Benchmark

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

2.38%

0.12%

(E)

(F)

2015 Compliance Obligation

Non-Solar RECs Needed for Compliance

Solar RECs Needed for Compliance

836

42

(G) = (D) \* (E)

(H) = (D) \* (F)

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

Non-Solar (RECs)

Solar (S-RECs)

0

0

(I)

(J)

Total 2015 Compliance Obligations

Non-Solar RECs Needed for Compliance

Solar RECs Needed for Compliance

836

42

(K) = (G) + (I)

(L) = (H) + (J)

2015 Performance (Per GATS and/or MRETS Data)

Non-Solar (RECs)

Solar (S-RECs)

836

42

(M)

(N)

Under Compliance in 2015, if applicable

Non-Solar (RECs)

Solar (S-RECs)

0

0

(O) = (K) - (M)

(P) = (L) - (N)

2015 Alternative Compliance Payments

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

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

\$49.96

\$300.00

(Q)

(R)

2015 Payments, if applicable

Non-Solar Total

Solar Total

TOTAL

\$0.00

\$0.00

\$0.00

(S) = (O) \* (Q)

(T) = (P) \* (R)

(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

# Hudson Energy Services, LLC – Subaccount Details – OH – Jan 2015 – Dec 2015

Subaccount Name	Zone Name	Month/ Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	Solar Renewable Energy Source	Renewable Energy Source	RPS	RPS Price	RPS Period	Deposit Date
Default	AEF Ohio	7/1/2012	NON54954	Refreshing Springs Church - Refreshing Springs Church	OH	SUN	473145 - 1 to 9	9	11-SPV-OH-GATS-2369	Yes		Yes	\$90.00	2015	3/16/2016
Default	AEF Ohio	10/1/2013	NON57333	College of Wooster - College of Wooster	OH	SUN	832894 - 1 to 21	21	11-SPV-OH-GATS-2955	Yes		Yes	\$63.00	2015	3/16/2016
Default	AEF Ohio	8/1/2012	NONE2087	Hillward Farm - B.Stafford	OH	SUN	499848 - 1 to 3	3	12-SPV-OH-GATS-0813	Yes		Yes	\$90.00	2015	3/16/2016
Default	AEF Ohio	8/1/2012	NONE4070	Killgore, Lynn Residence - Killgore, Lynn Residence	OH	SUN	501082 - 1 to 1	1	12-SPV-OH-GATS-0928	Yes		Yes	\$90.00	2015	3/16/2016
Default	AEF Ohio	12/1/2013	NON65795	ESS 1502 - Cincinnati, OH	OH	SUN	884136 - 1 to 2	2	12-SPV-OH-GATS-1210	Yes		Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	12/1/2013	NON65796	ESS 1503 - Cincinnati, OH	OH	SUN	878190 - 1 to 2	2	12-SPV-OH-GATS-1211	Yes		Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	12/1/2013	NON65800	ESS 1507 - Middletown, OH	OH	SUN	883908 - 1 to 2	2	12-SPV-OH-GATS-1215	Yes		Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	11/1/2013	NON6252	ESS 1509 - Sidney, OH	OH	SUN	866412 - 1 to 2	2	12-SPV-OH-GATS-1379	Yes		Yes	\$85.00	2015	3/16/2016
Default	AEF Ohio	4/1/2015	NON40745	Twin Bridges III Landfill Gas Facility - Twin Bridges Gas Recovery	IN	LFG	1401947 - 1 to 823	823	09-BIO-IN-GATS-0018		Yes	Yes	\$2.00	2015	3/16/2016
Default	AEF Ohio	11/1/2013	MSETS4312901	FE LORAIN 1 LF - 1	OH	LFG	855965 - 1988 to 2000	13	09-BIO-OH-GATS-0013		Yes	Yes	\$14.00	2015	3/16/2016

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

**Commission of Ohio Docketing Information System on**

**4/4/2016 9:28:35 AM**

**in**

**Case No(s). 16-0713-EL-ACP**

Summary: Report Public Version - Alternative Energy Compliance Report for Calendar Year 2015 electronically filed by Mr. Stephen M Howard on behalf of Hudson Energy Services, LLC