

FILE

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April 4, 2015

VIA HAND DELIVERY

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

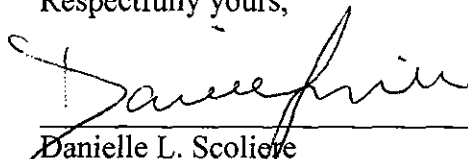
Re: Case No. 16-689-EL-ACP
Annual Alternative Energy Portfolio Status Report for Calendar Year 2015

Dear Ms. McNeal:

On behalf of EDF Energy Services, LLC ("EDF"), I respectfully submit EDF's Alternative Energy Portfolio Status Report for Calendar Year 2015 ("Annual Report"). Included is a public version of the Annual Report that is redacted and two confidential and unredacted copies of the Annual Report submitted under seal. Pursuant to Ohio Adm. Code 4901-1-24(D), a motion for protective order also is included with this filing to protect the confidential information contained in the Annual Report.

Thank you for your consideration.

Respectfully yours,


Danielle L. Scoliere

Attorney for EDF Energy Services, LLC

Enclosures:
Annual Alternative Energy Portfolio Status Report 2015
Motion for Protective Order

NAI-1500946232v1

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of EDF Energy Services,)	
LLC's Annual Alternative Energy Portfolio)	
Status Report and Plan for Compliance with)	Case No. 16-689-EL-ACP
Future Annual Renewable Energy)	
Benchmarks)	

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**Annual Alternative Energy Portfolio Status Report and
Plan for Compliance with Future Annual Renewable Energy Benchmarks**

I. INTRODUCTION

EDF Energy Services, LLC ("EDF") is a Competitive Retail Electric Service ("CRES") Provider, as defined in Ohio Revised Code ("R.C.") § 4928.01(A)(4), and an electric service company as defined within R.C. § 4928.01(A)(9). EDF is a wholly owned subsidiary of EDF Trading Holdings, LLC, and the Public Utilities Commission of Ohio (the "Commission") granted EDF's CRES Provider certificate on June 2, 2015.¹ EDF conducted retail sales of electricity to industrial customers throughout the state of Ohio. Pursuant to Ohio R.C. § 4928.64 and Ohio Admin. Code 4901:1-40-05 and 4901:1-40-03, EDF submits this Annual Alternative Energy Status Report for the period January 1, 2015 through December 31, 2015 (the "Annual Report") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

II. COMPLIANCE WITH 2015 BENCHMARKS

Pursuant to R.C. § 4928.64(B)(2) and Ohio Adm. Code 4901:1-40-03(A)(2), electric service companies must demonstrate that 2.5% of the retail electricity they sold was derived

¹ *EDF Energy Services, LLC*, Certificate No. 13-644E (2), Case No. 13-0327-EL-CRS (June 2, 2015). EDF Industrial Power Services (OH), LLC ("EIPS OH") was granted a CRES Provider certificate, Certificate No. 13-644E(1), on March 11, 2013. Effective April 27, 2015, EIPS (OH) merged with its affiliate, EDF. EDF is the surviving entity, and the Commission granted EDF a revised certificate on June 2, 2015.

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from renewable energy resources. Additionally, 0.12% of the retail electricity sold by electric service companies must be derived from solar energy resources, which portion may also be counted toward the renewable energy resources target. These benchmarks must be determined by calculating a baseline number of kilowatt-hours and applying the benchmark percentages to the baseline.

A. Initial Baseline Calculation

EDF has elected to determine its baseline utilizing the methodology set forth in R.C. § 4928.643(B), which allows a company to “choose for its baseline for compliance with the qualified renewable energy resource requirements of section 4928.64 of the Revised Code to be the total kilowatt hours sold to the applicable customers.” EDF’s sales for calendar year 2015 were 1,441,945 MWh.

B. 2015 Renewable and Solar Energy Benchmarks and Compliance

EDF submits that it met its benchmark obligations for the 2015 compliance year. EDF’s Compliance Plan Status Report for Compliance Year 2015 Summary Sheet demonstrating its compliance is attached as Exhibit A.

III. PLAN FOR COMPLIANCE WITH FUTURE ANNUAL ADVANCED ENERGY AND RENEWABLE ENERGY BENCHMARKS

Pursuant to Ohio Adm. Code 4901:1-40-03(C), all Ohio electric service companies must file an annual plan for compliance containing the following information:

1. The baseline for current and future calendar years;
2. A supply portfolio projection that includes both generation fleet and power purchases;
3. A description of the methodology used to evaluate the electric service company’s compliance options; and

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4. A discussion of any perceived impediments to achieving compliance with the required benchmarks, and any suggestions for addressing these impediments.

Below are EDF's current and forecasted sales volumes for the years 2015 through 2025, as well as the corresponding number of RECs EDF anticipates purchasing to meet each benchmark.

Current and Forecasted Benchmarks and RECs 2015-2024						
Year	Baseline (MWH)	Solar % Needed	Solar RECs	Non-Solar % Needed	Non-Solar RECs	Total RECs
2015	1,441,945	0.12%	1,730	2.38%	34,318	36,048
2016						
2017						
2018						
2019						
2020						
2021						
2022						
2023						
2024						
2025						

* As noted, the baseline is the actual metered load for 2015.

EDF does not own any electric generation facilities, and instead supplies electric retail service to its customers by purchasing power in the wholesale electricity market. As a result, EDF's generation resource mix approximates the PJM interconnection residual fuel mix "PJM Residual Mix") as it is reported in the most current publicly available PJM Residual Mix Annual GATS Report. The 2015 PJM Residual Mix Annual GATS Report is attached as Exhibit B. To the extent that the PJM Residual Mix for any year falls short of the renewable energy benchmarks for that year, EDF plans to overcome the difference by producing the associated

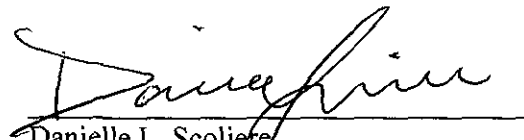
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RECs needed to meet the benchmarks. EDF foresees no impediments to achieving compliance through this plan.

IV. CONCLUSION

Based on the information above, EDF respectfully requests that the Commission accept this Annual Report and find that EDF has complied with the applicable energy benchmarks for 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Danielle L. Scoliere', is written over a horizontal line.

Danielle L. Scoliere

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Attorney for EDF Energy Services, LLC

Dated April 4, 2016.

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EXHIBIT A

(Compliance Plan Status Report for Compliance Year 2015)

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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	(A)
2013		0	0	(B)
2014	1,441,945	0	1,441,945	(C)
Baseline for 2015 Compliance Obligation (MWhs)			1,441,945	(D) = AvgABC
<i>(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>				
				<div style="border: 1px solid black; padding: 2px;">i.e., Not Adjusted</div>
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		34,318	(G) = (D) * (E)
	Solar RECs Needed for Compliance		1,730	(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		34,318	(K) = (G) + (I)
	Solar RECs Needed for Compliance		1,730	(L) = (H) + (J)
	2015 Performance (Per GATS and/or MRETS Data)			
	Non-Solar (RECs)		34,320	(M)
	Solar (S-RECs)		1,734	(N)
	Under Compliance in 2015, if applicable			
	Non-Solar (RECs)		N/A	(O) = (K) - (M)
	Solar (S-RECs)		N/A	(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		N/A	(S) = (O) * (Q)
	Solar Total		N/A	(T) = (P) * (R)
	TOTAL		N/A	(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

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EXHIBIT B

(PJM Residual Mix Annual GATS Report 2015)

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PJM Residual Mix - Year: 2015

Year	Fuel	# of Certificates	Fuel %	Carbon Dioxide	Nitrogen Oxides	Sulphur Dioxides
2015	Oil - Jet Fuel	47	0.0000	0.0001	0.0000	0.0000
2015	Oil - Kerosene	1,175	0.0002	0.0045	0.0000	0.0000
2015	Gas - Propane	4,033	0.0006	0.0148	0.0000	0.0000
2015	Other	20,583	0.0028	0.0220	0.0000	0.0002
2015	Gas - Other	96,335	0.0133	0.1423	0.0004	0.0000
2015	Fuel Cell - Non-Renewable	227,065	0.0313	0.0000	0.0000	0.0000
2015	Oil - Distillate Fuel Oil	349,031	0.0481	0.9562	0.0027	0.0008
2015	Hydro - Conventional	464,487	0.0640	0.0000	0.0000	0.0000
2015	Oil - Residual Fuel Oil	769,149	0.1060	2.8735	0.0038	0.0108
2015	Oil - Petroleum Coke	1,089,248	0.1502	4.4134	0.0015	0.0072
2015	Coal - Waste/Other	2,921,490	0.4028	8.4491	0.0026	0.0004
2015	Coal - Sub-Bituminous	36,961,848	5.0959	111.5820	0.0862	0.2961
2015	Import System Mix	42,207,104	5.8191	64.4783	0.0547	0.1571
2015	Gas - Natural Gas	174,125,753	24.0065	233.1709	0.0607	0.0059
2015	Coal - Bituminous and Anthracite	190,541,297	26.2697	539.3566	0.5084	1.1911
2015	Nuclear	275,547,361	37.9895	0.0000	0.0000	0.0000
Total		725,326,006	100.0000	965.4637	0.7210	1.6696

NEITHER THE GATS ADMINISTRATOR NOR PJM EIS NOR THE SYSTEM OPERATOR NOR THE PJM EIS
GATS PROJECT MANAGER KNOWS OR ENDORSES THE CREDITWORTHINESS OR REPUTATION OF ANY
GATS ACCOUNT HOLDER LISTED IN THIS DIRECTORY