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

April 14, 2016

RE: **Docket No. 16-0762-EL-ACP – Direct Energy Business Marketing, LLC's
Annual Renewable Portfolio Standards Compliance Filing for 2015**

Dear Commission:

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

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	560,522	0	560,522		(C)
Baseline for 2015 Compliance Obligation (MWHs)			747,050	adjusted	(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%
	2015 Solar Renewable Benchmark				0.12%
	Per R.C., 4928.64(B)(2)				
	2015 Compliance Obligation				
	Non-Solar RECs Needed for Compliance				17,780
	Solar RECs Needed for Compliance				896
	Carry-Over from Previous Year(s), if applicable				
	Non-Solar (RECs)				0
	Solar (S-RECs)				0
	Total 2015 Compliance Obligations				
	Non-Solar RECs Needed for Compliance				17,780
	Solar RECs Needed for Compliance				896
	2015 Performance (Per GATS and/or MRETS Data)				
	Non-Solar (RECs)				17,780
	Solar (S-RECs)				896
	Under Compliance in 2015, if applicable				
	Non-Solar (RECs)				0
	Solar (S-RECs)				0
	2015 Alternative Compliance Payments				
	Non-Solar, per REC (Refer to Case 15-0461-EL-ACP)				\$49.96
	Solar, per S-REC (Refer to R.C. 4928.64(C)(2)(a))				\$300.00
	2015 Payments, if applicable				
	Non-Solar Total				\$0.00
	Solar Total				\$0.00
	TOTAL				\$0.00

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

**COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
ALTERNATIVE ENERGY ANNUAL STATUS REPORT FOR CALENDAR YEAR 2015**

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 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.

2. Determination of the sales baseline for 2015

- a. During the past three calendar years the CRES made retail sales of generation in the amounts shown below:

2012 MWh	0
2013 MWh	0
2014 MWh	560,522

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

560,522

- 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).

747,050

- d. If the CRES was not active during calendar years 2012, 2013, and 2014 but did make sales during calendar year 2015, please project the amount of retail electric generation sales anticipated for the whole of calendar year 2015 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 2015				
Types	(A) No. of RECs Required	(B) No. of RECs Obtained	(C) Registry	(D) No. of RECs Sited in OH
Solar	896	896	GATS	896
Non Solar	17,780	17,780	GATS	0
Total	18,676	18,676	GATS	896

- 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:

<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 2015.

Approved registry being used by the CRES: PJM-GATS

- c. The CRES states that of the RECs it has obtained for 2015 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

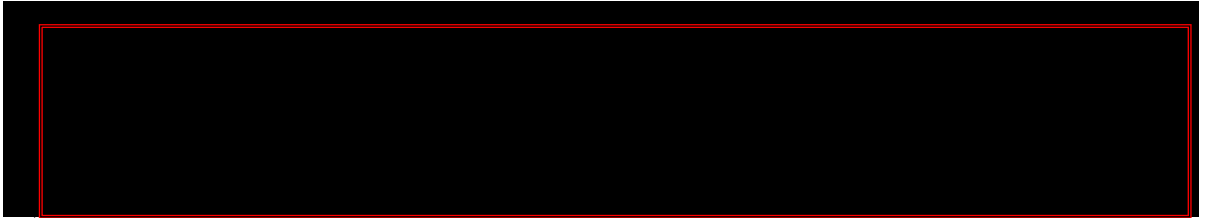
In accordance with Rule 4901:1-40-03(C) the CRES hereby provides a projection for the next 10 years for RECs and Solar RECs.

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
2016				
2017				
2018				
2019				
2020				
2021				
2022				
2023				
2024				
2025				

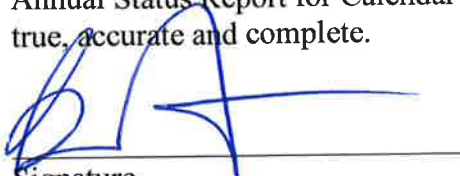
b. Supply Portfolio projection:

c.



- 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 2015, including any exhibits and attachments, are true, accurate and complete.



Signature

Name: Bray Dohrwardt
Title: Vice President and Secretary
Company: 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.

Direct Energy Business Marketing, LLC - My RPS Compliance - OH - Jan 2015 - Dec 2015

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Delete	Total Generation for Subaccount	Solar Renewable Energy Source	Renewable Energy Source	Total Certificates Used for RPS
Direct Energy Business Marketing, LLC	Default	AEP Ohio	302,072	293781		7,345	353	6,992	7,345
Direct Energy Business Marketing, LLC	Default	FEOH	347,382	546492		13,662	655	13,007	13,662
Total			649,454			21,007	1,008	19,999	21,007

Direct Energy Business Marketing, 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
Default	AEP Ohio	02/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	926853 - 1 to 4	4	13-SPV-OH-GATS-0249
Default	AEP Ohio	05/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	1028467 - 1 to 92	92	13-SPV-OH-GATS-0249
Default	AEP Ohio	02/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	926853 - 26 to 45	20	13-SPV-OH-GATS-0249
Default	AEP Ohio	03/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	951374 - 1 to 109	109	13-SPV-OH-GATS-0249
Default	AEP Ohio	04/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	1009082 - 1 to 128	128	13-SPV-OH-GATS-0249
Default	AEP Ohio	07/2012	NON40991	Domtar Hawesville Mill - Kentucky Mills	KY	BLQ	464760 - 1 to 6992	6,992	10-BIO-KY-GATS-0072
Default	FEOH	12/2014	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1279528 - 1 to 15	15	12-SPV-OH-GATS-1389
Default	FEOH	11/2014	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1250548 - 1 to 22	22	12-SPV-OH-GATS-1389
Default	FEOH	10/2014	NON66937	KSU Kent Field House Roof Mounted - 463.32 kW PV Array	OH	SUN	1221384 - 1 to 37	37	12-SPV-OH-GATS-1389
Default	FEOH	09/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	1203048 - 1 to 121	121	13-SPV-OH-GATS-0249
Default	FEOH	05/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	1028467 - 93 to 146	54	13-SPV-OH-GATS-0249
Default	FEOH	07/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	1105351 - 1 to 141	141	13-SPV-OH-GATS-0249
Default	FEOH	08/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	1143860 - 1 to 127	127	13-SPV-OH-GATS-0249
Default	FEOH	06/2014	NON62085	IKEA #175 - West Chester, OH	OH	SUN	1072804 - 1 to 138	138	13-SPV-OH-GATS-0249
Default	FEOH	07/2012	NON40991	Domtar Hawesville Mill - Kentucky Mills	KY	BLQ	464760 - 6993 to 9756	2,764	10-BIO-KY-GATS-0072
Default	FEOH	07/2012	NON40991	Domtar Hawesville Mill - Kentucky Mills	KY	WDS	464761 - 5157 to 5244	88	10-BIO-KY-GATS-0072
Default	FEOH	08/2013	MSET89634101	Belleville - 1	WV	WAT	765326 - 771 to 10925	10,155	10-HYD-WV-GATS-0040

Direct Energy Business Marketing, LLC - Subaccount Details - OH - Jan 2015 - Dec 2015

Solar Renewable Energy Source	Renewable Energy Source	RPS	RPS Price	RPS Period	Deposit Date
Yes		Yes	\$45.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
	Yes	Yes	\$7.50	2015	04/07/2016
Yes		Yes	\$15.00	2015	04/07/2016
Yes		Yes	\$15.00	2015	04/07/2016
Yes		Yes	\$15.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
Yes		Yes	\$45.00	2015	04/07/2016
	Yes	Yes	\$7.50	2015	04/07/2016
	Yes	Yes	\$7.50	2015	04/07/2016
	Yes	Yes	\$5.00	2015	04/07/2016

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4/12/2016 1:35:03 PM

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Case No(s). 16-0762-EL-ACP

Summary: Report Annual Renewable Portfolio Standards Compliance Filing for 2015
electronically filed by Mr. Ryan D Harwell on behalf of Direct Energy Business Marketing, LLC