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April 13, 2015

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

Re: Case No. 16-785-EL-ACP
Noble Americas Energy Solutions LLC
Public Version of Alternative Energy Resource Portfolio Report for 2015

Dear Ms. McNeal:

On behalf of Noble Americas Energy Solutions LLC, I am submitting a public version of its Alternative Energy Resource Portfolio Report for 2015. A motion for protective order was also filed today and a confidential version of this report is being submitted under seal.

Thank you in advance for your consideration.

Sincerely yours,

Stephen M. Howard
Attorneys for Noble Americas Energy Solutions LLC

SMH/jaw
Enclosure

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2015

Noble Americas Energy Solutions 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 Annual Alternative Energy Report ("AER") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

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 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 _____.

2012 _____ MWh
2013 _____ MWh
2014 _____ MWh

- c. The CRES had no retail electric sales in Ohio during the preceding three calendar years; therefore, its initial baseline shall consist of a reasonable projection of its retail electric sales in Ohio for a full calendar year. That reasonable projection of its retail

electric sales in Ohio for the full calendar year of 2015 is _____. Subsequent baselines shall consist of actual sales data.

- d. Beginning with compliance year 2014, a CRES may choose for its baseline the total kilowatt hours sold to any and all applicable retail consumers located in Ohio in 2014 who are served by the CRES. Such actual sales in 2015 was 4,131,016 MWh.
- e. 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 OBTAINED FOR 2015

Types	No. of RECs Required (a)	No. of RECs Obtained (b)	Registry (c)
Solar	4,957	4,957	PJM — GATS
Non Solar	98,318	98,318	PJM — GATS
Total	103,275	103,275	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 obtained 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/M-RETS registry for the RECs detailed above.
- d. The CRES states that it did not seek and did not receive a *force majeure* determination for Solar RECs.
- e. The CRES notes that, per the "Staff Findings and Recommendations" that was filed with the PUCO Docketing Information System on January 12, 2016 in Case No. 15-0711-EL-ACP, Staff recommended that the CRES use the historical carryover of 1 SREC and 15 RECs for its 2015 compliance. These quantities were included in column (b) above to meet 2015 compliance

IV. Compliance (check one)

- ☒ 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).

- ☐ 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). 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:

Noble Americas Energy Solutions LLC states that it intends to purchase all required RECs, both Solar RECs and Non-Solar RECs from suppliers who have received a renewable energy facility certificate from the Public Utilities Commission, have joined an approved REC registry and will transfer RECs from the generator's account to the CRES account.

c. The Methodology used to evaluate compliance is based upon:

Because the generation market is one of great volatility and because customers are free to contract with any CRES supplier, governmental aggregator or utilize a utility standard service offer, Noble Americas Energy Solutions LLC has projected out sales to the end of the current Electric Security Plan period for each of the utility service areas in which it conducts sales based on its most current business plan available at the time of submission of this Report. Since the price to compare will change at the end of the Electric Security Plan, projecting the ability to maintain

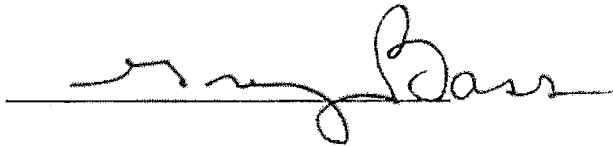
sales, let alone increase sales, is problematic at best. Thus, the CRES has assumed that load will remain constant, and the increase in total RECs comes from the increase in requirement percentages.

- 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.

Noble Americas Energy Solutions LLC has no comments at this time.

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2015

I, Greg Bass, am the duly authorized representative of Noble Americas Energy Solutions LLC. To the best of my knowledge all the information contained in the foregoing report including any exhibits and attachments are true, accurate and complete.

A handwritten signature in black ink, appearing to read "Greg Bass", is written over a horizontal line.

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		0	0	(C)

Baseline for 2015 Compliance Obligation (MWHs)

4,131,016

(D) = AvgABC

(Note: If using 2015 sales as your baseline, insert that figure in cell t14 and indicate in box to right if 2015 sales are adjusted or not.

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

98,318

(G) = (D) * (E)

Solar RECs Needed for Compliance

4,957

(H) = (D) * (F)

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

Non-Solar (RECs)

-15

(I)

Solar (S-RECs)

-1

(J)

Total 2015 Compliance Obligations

Non-Solar RECs Needed for Compliance

98,303

(K) = (G) + (I)

Solar RECs Needed for Compliance

4,956

(L) = (H) + (J)

2015 Performance (Per GATS and/or MRETS Data)

Non-Solar (RECs)

98,303

(M)

Solar (S-RECs)

4,956

(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

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/13/2016 9:38:04 AM

in

Case No(s). 16-0785-EL-ACP

Summary: Report Public Version of Alternative Energy Resource Portfolio Report for 2015
electronically filed by Mr. Stephen M Howard on behalf of Noble Americas Energy Solutions
LLC