

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Annual Alternative)
Energy Portfolio Status Report of Dynegy) Case No. 16-0820-EL-ACP
Energy Services (East), LLC.)

In the Matter of the Report of Dynegy)
Energy Services (East), LLC, Concerning its)
Plan for Compliance with Advanced and)
Renewable Energy.)

**DYNEGY ENERGY SERVICES (EAST), LLC’S
ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT
AND
PLAN FOR COMPLIANCE WITH FUTURE ANNUAL ADVANCED
AND RENEWABLE ENERGY BENCHMARKS**

I. INTRODUCTION

Dynegy Energy Services (East), LLC (“DES-East”) currently provides competitive retail electric generation service throughout Ohio as a PUCO certified CRES provider (PUCO Case No. 04-1323; Certificate No. 04-124E(6)).

Pursuant to R.C. 4928.64 and Ohio Administrative Code (O.A.C) Rule 4901:1-40-05, all Ohio electric service companies are required to file, by April 15 of each year, an annual alternative energy portfolio status report. In this report, electric service companies are required to analyze “all activities undertaken in the previous calendar year to demonstrate how the applicable alternative energy portfolio benchmarks and planning requirements have or will be met.”¹ The annual review is to include compliance with the most recent applicable renewable

¹ O.A.C. Rule 4901:1-40-05(A).

energy and solar energy resource benchmarks. To meet these requirements, DES-East submits the following report, which:

- Identifies its 2015 baseline;
- Identifies its 2015 renewable energy and solar energy benchmarks and demonstrates its compliance with those benchmarks; and
- Provides its plan for compliance with future annual advanced and renewable energy benchmarks, as required by O.A.C. Rule 4901:1-40-03(C).

II. ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT

Pursuant to R.C. 4928.64(B)(2), for the year 2015, electric service companies must demonstrate that two and a half percent (2.5%) of the retail electricity sold was derived from renewable energy resources. In addition, 0.12 percent of the electricity sold must have been generated by solar energy resources, which portion may also be counted toward the renewable requirement. The level of these benchmark requirements is determined by first calculating a baseline number of kilowatt hours and then applying the benchmark percentages to that baseline.

A. Baseline Calculation

An electric service company's baseline may be based on the total kilowatt hours sold to retail electric consumers located within this state in the applicable compliance year. DES-East's actual 2015 calendar year total unadjusted kilowatt hours of electricity sold to retail electricity consumers located in Ohio was 7,766,186 MWHs.

B. Renewable and Solar Energy Benchmarks

The 2015 compliance baseline and benchmark requirement calculations are as follows:

Solar Requirement	0.12%
Non-Solar Requirement	2.38%
Overall Requirement	2.50%
Solar RECs (SRECS) Required	9,319
Non-Solar RECs Required	184,835
Total RECs Required	194,154

C. Demonstration of Compliance with Renewable Energy Benchmarks

Pursuant to R.C. 4928.65, electric service companies may meet their renewable energy benchmarks through the use of renewable energy credits (RECs). DES-East successfully met its renewable energy benchmarks using RECs acquired through market purchases. DES-East appropriately maintained, and DES-East continues to maintain, such RECs in its Generation Attributes Tracking System (GATS) account.

D. Summary of DES-East's Compliance Strategy

DES-East's renewable energy source compliance strategy is to purchase the required RECs and SRECs in the market. DES-East also intends to respond to Requests for Proposals (RFPs) for the purchase of renewable energy resources where appropriate.

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

A. Baseline for Future Calendar Years

DES-East is unable to forecast its baseline for future calendar years with any confidence because of the evolving nature of the retail electricity market in Ohio. In addition, although DES-East will continue to establish new customer contracts, many of those contracts are short in duration and competition in Ohio is increasing.

B. Supply Portfolio Projection, Including both Generation Fleet and Power Purchases

DES-East does not own, and has no plans to construct or purchase, any electric generation facilities. Therefore, DES-East will continue to supply power to its customers by purchasing power through market brokers, RFPs, and third party contracts.

C. Description of Methodology Used to Evaluate Compliance Options

As noted above, DES-East does not own or anticipate owning any generation facilities. Therefore, DES-East will meet its alternative energy benchmarks through purchases of RECs and SRECs. DES-East is unable to provide a more detailed description of its compliance methodology, due to regulatory uncertainty of the renewable energy market, but will continue to explore alternative compliance opportunities.

D. Impediments to Achieving Compliance with Benchmarks

DES-East has not identified any impediments to achieving compliance with the benchmarks.

IV. CONCLUSION

Based on the foregoing, DES-East respectfully requests that this Commission find that DES-East satisfactorily complied with its 2015 renewable energy compliance requirements.

April 15, 2016

Respectfully submitted,

/s David F. Proaño

David F. Proaño (0078838) (*Counsel of Record*)

dproano@bakerlaw.com

Martin T. Booher (0090333)

mbooher@bakerlaw.com

BAKER & HOSTETLER LLP

1900 East Ninth Street, Suite 3200

Cleveland, Ohio 44114

Phone: 216-861-7834

Fax: 216-696-0740

Counsel for Dynegy Energy Services (East), LLC

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Summary: Annual Report In the Matter of the Annual Alternative Energy Portfolio Status Report and Plan for Compliance with Advanced and Renewable Energy of Dynegy Energy Services (East), LLC electronically filed by Mr. David F. Proano on behalf of Dynegy Energy Services (East), LLC