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April 14, 2017

VIA ELECTRONIC FILING AND FEDEX

Ms. Barcy F. McNeal, Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street, 11th Floor  
Columbus, OH 43215

2017 APR 17 AM 11:31  
PUCO

**RE: Case No. 17-0985-EL-ACP  
Annual Alternative Energy Portfolio Status Report for Calendar Year 2016**

Dear Ms. McNeal:

On behalf of EDF Energy Services, LLC ("EDF"), I respectfully submit EDF's Alternative Energy Portfolio Status Report for Calendar Year 2016 ("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 submitted,

/s/ David E. Kronenberg  
David E. Kronenberg

*Attorney for EDF Energy Services, LLC*

Enclosures:  
Annual Alternative Energy Portfolio Status Report 2016  
Motion for Protective Order

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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. 17-0985-EL-ACP
Future Annual Renewable Energy	)	
Benchmarks	)	

**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.<sup>1</sup> Last year, 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 from January 1, 2016 through December 31, 2016 (the "Annual Report") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

**II. COMPLIANCE WITH 2016 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 from

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<sup>1</sup> *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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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 2016 were 1,376,185 MWh.

### **B. 2016 Renewable and Solar Energy Benchmarks and Compliance**

EDF submits that it met its benchmark obligations for the 2016 compliance year. EDF’s Compliance Plan Status Report for Compliance Year 2016 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
4. A discussion of any perceived impediments to achieving compliance with the required benchmarks, and any suggestions for addressing these impediments.

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Below are EDF's current and forecasted sales volumes for the years 2016 through 2025, as well as the corresponding number of RECs EDF anticipates purchasing to meet each benchmark.

Current and Forecasted Benchmarks and RECs 2016-2025						
Year	Baseline (MWH)	Solar % Needed	Solar RECs	Non-Solar % Needed	Non-Solar RECs	Total RECs
2016	1,376,185	0.12%	1,651	2.38%	32,753	34,404
2017						
2018						
2019						
2020						
2021						
2022						
2023						
2024						
2025						

\* As noted, the baseline is the actual metered load for 2016.

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 2016 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 RECs needed to meet the benchmarks. EDF foresees no impediments to achieving compliance through this plan.

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**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 2016.

Respectfully submitted,

/s/ David E. Kronenberg

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*Attorney for EDF Energy Services, LLC*

Dated April 14, 2017.

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**EXHIBIT A**

**(Compliance Plan Status Report for Compliance Year 2016)**

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Compliance Plan Status Report for Compliance Year 2016 Summary Sheet				
	Sales Unadjusted (MWhs)	Proposed Adjustments (MWhs)	Sales Adjusted (MWhs)	Source of Sales Volume Data
2013			0	(A)
2014			0	(B)
2015			0	(C)
Baseline for 2016 Compliance Obligation (MWhs)			1,376.185	(D) = AvgABC
<i>(Note: if using 2016 sales as your baseline, insert that figure in cell k14 and indicate in cell k16 if 2016 sales are adjusted or not.</i>				
			Not Adjusted	
2.50%	2016 Statutory Compliance Obligation			
	2016 Non-Solar Renewable Benchmark		2.38%	(E)
	2016 Solar Renewable Benchmark		0.12%	(F)
	Per R.C. 4928.64(B)(2)			
	2016 Compliance Obligation			
	Non-Solar RECs Needed for Compliance		32,753	(G) = (D) * (E)
	Solar RECs Needed for Compliance		1,651	(H) = (D) * (F)
	Carry-Over from Previous Year(s), if applicable			
	Non-Solar (RECs)		0	(I)
	Solar (S-RECs)		0	(J)
	Total 2016 Compliance Obligations			
	Non-Solar RECs Needed for Compliance		32,753	(K) = (G) + (I)
	Solar RECs Needed for Compliance		1,651	(L) = (H) + (J)
	2016 Performance (Per GATS and/or MRETS Data)			
	Non-Solar (RECs)		32,753	(M)
	Solar (S-RECs)		1,652	(N)
	Under Compliance in 2016, if applicable			
	Non-Solar (RECs)		-1	(O) = (K) - (M)
	Solar (S-RECs)		-1	(P) = (L) - (N)
	2016 Alternative Compliance Payments			
	Non-Solar, per REC (Refer to Case 16-0714-EL-ACP)		\$49.75	(Q)
	Solar, per S-REC (Refer to R.C. 4928.64(C)(2)(a))		\$300.00	(R)
	2016 Payments, if applicable			
	Non-Solar Total		-\$49.75	(S) = (O) * (Q)
	Solar Total		-\$300.00	(T) = (P) * (R)
	TOTAL		-\$349.75	(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 2016 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 2016)**

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PJM Residual Mix - Year: 2016

Year	Fuel	# of Certificates	Fuel %	Carbon Dioxide	Nitrogen Oxides	Sulphur Dioxides
2016	Energy Storage Resource	3	0.0000	0.0000	0.0000	0.0000
2016	Oil - Jet Fuel	155	0.0000	0.0004	0.0000	0.0000
2016	Captured Methane - Landfill Gas	200	0.0000	0.0000	0.0000	0.0000
2016	Gas - Propane	1,735	0.0002	0.0063	0.0000	0.0000
2016	Pumped Storage	37,474	0.0049	0.0000	0.0000	0.0000
2016	Other	43,976	0.0057	0.0299	0.0000	0.0002
2016	Fuel Cell - Non-Renewable	227,628	0.0297	0.0000	0.0000	0.0000
2016	Gas - Other	260,289	0.0339	0.3385	0.0010	0.0000
2016	Oil - Distillate Fuel Oil	328,647	0.0428	0.8777	0.0017	0.0006
2016	Oil - Residual Fuel Oil	330,387	0.0430	1.0725	0.0014	0.0038
2016	Hydro - Conventional	576,561	0.0751	0.0000	0.0000	0.0000
2016	Oil - Petroleum Coke	970,385	0.1264	3.6191	0.0015	0.0053
2016	Coal - Waste/Other	3,319,276	0.4324	9.0418	0.0030	0.0005
2016	Import System Mix	25,571,218	3.3312	35.8020	0.0285	0.0688
2016	Coal - Sub-Bituminous	29,901,817	3.8954	84.1780	0.0709	0.1772
2016	Gas - Natural Gas	206,688,888	26.9257	256.6973	0.0678	0.0123
2016	Coal - Bituminous and Anthracite	222,798,231	29.0243	599.3752	0.5654	1.0207
2016	Nuclear	276,569,424	36.0293	0.0000	0.0000	0.0000
Total		767,626,294	100.0000	991.0387	0.7412	1.2894

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

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