

Confidential Release

Case Number: 14-601-EL-ACP

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**Document Description: Alternative Energy
Portfolio Compliance Status Report for 2013.**

“Consent to Release to the PUCO DIS Website”

Name



Reviewing Attorney Examiner's Signature

Date Reviewed

SEP 21 2017

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Case: 14-0601-EL-ACP

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Filed by: Stephen M. Howard

On Behalf of: Cincinnati Bell Energy

*Summary of document: Alternative Energy Portfolio Compliance
Status Report for Calendar Year 2013*

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April 14, 2014

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

Re: Case No. 14-601-EL-ACP
Cincinnati Bell Energy, LLC
Confidential Version of Alternative Energy Compliance Report for 2013

Dear Ms. McNeal:

Pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, I am submitting three copies of the confidential version of the Alternative Energy Compliance Report for Calendar Year 2013 for Cincinnati Bell Energy, LLC. This report contains confidential and proprietary information and should not be released to the public. A public version and a motion for protective order were filed earlier today. Please maintain the confidentiality of this document until such time as the Attorney Examiner can rule upon our motion for protective order.

Thank you for your consideration.

Sincerely yours,

Stephen M. Howard
Attorneys for Cincinnati Bell Energy, LLC

SMH/smf
Enclosures

**COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER ALTERNATIVE ENERGY RESOURCES REPORT FOR
CALENDAR YEAR 2013**

Cincinnati Bell Energy, LLC, (hereinafter "CRES"), in accordance with Sections 4928.64 and 4928.65, Revised Code and Commission Rules 4901:11-40-03 and 4901:1-40-05, hereby submits this Annual Alternative Energy Report ("AER") detailing compliance with Ohio Alternative Energy Portfolio Standards ("OH AEPS"),

PUCO

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- I. Determination that an Alternative Energy Resource Report is Required
 - a. During Calendar year 2013, the CRES states that it conducted retail sales of generation customers who utilized the generation in a load center located within the state of Ohio.
- II. Determination of the sales baseline for 2013
 - a. during the past three calendar years, the CRES made retail sales of generation in the amounts shows below:
 - i. 2010- 0 MWh
 - ii. 2011- 23,554 MWh
 - iii. 2012- 125,864 MWh
- 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 2013					
Types	No. of RECs Required(a)	No. of RECs obtained (b)	Registry (c)	No. of RECs sited in Ohio (d)	No. of RECs sited in Ohio Adjacent states
Solar	67	67	PJM GATS	34	33
Non-Solar	1,427	1,427	PJM GATS	1,427	0
Total	1,494	1,494	PJM GATS	1,461	33

- a. Column (a) above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2013.
- b. The CRES states that it has obtained the number of Solar and Non Solar RECs listed in column (b) above for 2013.
- c. The CRES used the PJM GATS registry for the RECs detailed above. Please note that the GATS account holder is Viridian energy PA LLC ("VEPA"), an affiliate of the CRES. Both the CRES and VEPA are wholly owned subsidiaries of Regional Energy Holdings, Inc (REHI), and VEPA is the entity under which REHI serves most of its electricity load in the PJM territory. All electricity served in Ohio, however, is under the CRES.
- d. The CRES states that, of the RECs it has obtained for 2013, the number listed in column (d) represents the RECs with generation facilities sited within the state of Ohio.

IV. Compliance

- a. 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).

V. Ten Year Forecast

- a. In accordance with Rule 4901:1-40-03(0) the CRES hereby provides a projection for the next 10 years for RECs and Solar RECs.

Year	Solar RECs	Non-Solar RECs	Total RECs
2014	363	7,555	7918
2015	505	11,790	12295
2016	660	16,512	17172
2017	848	21,190	22038
2018	1052	26,295	27347
2019	1274	31,858	33132
2020	1516	37,911	39427
2021	1780	44,490	46270
2022	2047	51,166	53213
2023	2334	58,329	60663

b. Supply portfolio projection

The CRES does not own any generation assets that can be utilized for Ohio compliance. CRES intends to purchase both Solar and Non-Solar RECs from generators who have been certified as renewable from PUCO, have joined an approved REC registry and will transfer RECs from the generator's account to the CRES account.

c. Methodology used to evaluate compliance

CRES has used internal forecasting methods to forecast our retail sales over the next ten years, and multiplied the annual sales by the then-current Ohio Alternative Energy Portfolio Standards percentage.

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.

CRES does not have any comments at this time.

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER ALTERNATIVE ENERGY RESOURCES REPORT FOR
CALENDAR YEAR 2013

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I, Kevin Bhuvu, am a duly authorized representative of Cincinnati Bell Energy 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 Resources Report for Calendar Year 2013, including any exhibits and attachments, are true, accurate and complete.

X

Kevin Bhuvu
Director - Finance & Risk

Compliance Plan Status Report for Compliance Year 2013
Summary Sheet

	Sales	Proposed	Sales	Source of
	Unadjusted (MWHs)	Adjustments (MWHs)	Adjusted (MWHs)	Sales Volume Data
2010	0	0	0	(A)
2011	23,554	0	23,554	(B)
2012	125,864	0	125,864	(C)
Baseline for 2013 Compliance Obligation			74,709	(D) = AvgABC
2.00%	2013 Statutory Compliance Obligation			
	2013 Non-Solar Renewable Benchmark		1.91%	(E)
	2013 Solar Renewable Benchmark		0.09%	(F)
	Per ORC, 4928.64(B)(2)			
2013 Compliance Obligation				
	Non-Solar RECs Needed for Compliance		1,427	(G) = (D) * (E)
	Minimum Required from Ohio Facilities		714	(H) = (G) * 0.5
	Solar RECs Needed for Compliance		67	(I) = (D) * (F)
	Minimum Required from Ohio Facilities		34	(J) = (I) * 0.5
Carry-Over from Previous Year(s), if applicable				
	Ohio Non-Solar - MWHs		0	(K)
	Other Non-Solar - MWHs		0	(L)
	Ohio Solar - MWHs		0	(M)
	Other Solar - MWHs		0	(N)
Total 2013 Compliance Obligations				
	Non-Solar RECs Needed for Compliance		1,427	(O) = (G) + (K) + (L)
	Minimum Required from Ohio Facilities		714	(P) = (H) + (K)
	Solar RECs Needed for Compliance		67	(Q) = (I) + (M) + (N)
	Minimum Required from Ohio Facilities		34	(R) = (J) + (M)
2013 Performance (Per GATS or MRETS Data)				
	Ohio Non-Solar - MWHs		1,427	(S)
	Other Non-Solar - MWHs		0	(T)
	Ohio Solar - MWHs		34	(U)
	Other Solar - MWHs		33	(V)
Under Compliance in 2013, if applicable				
	Ohio Non-Solar - MWHs		-713	(W) = (P) - (S)
	Other Non-Solar - MWHs		713	(X) = (O - P) - (T)
	Ohio Solar - MWHs		0	(Y) = (R) - (U)
	Other Solar - MWHs		0	(Z) = (Q - R) - (V)
2013 Alternative Compliance Payments				
	Non-Solar, per MWH (Refer to Case 13-0995-EL-ACP)		\$48.56	(AA)
	Solar, per MWH - per 4928.64(C)(2)(a)		\$350.00	(BB)
2013 Payments, if applicable				
	Non-Solar Total		\$0.00	(CC) = (W+X) * (AA)
	Solar Total		\$0.00	(DD) = (Y+Z) * (BB)
	TOTAL		\$0.00	(EE) = (CC) + (DD)

This formula assumes sales during at least one of the 3 preceding years. If that is not the case, then rows A, B and C should be zero and estimated or actual sales should be used in row D. Refer to 4901:1-40-03(B), OAC, for details on the baseline calculation methodologies. Contact Staff with any questions.

This compliance worksheet was developed by Staff for internal review purposes. However, it may be useful for your company in preparation of its AEPs annual compliance status report for the 2013 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