

# Confidential Release

**Case Number: 13-930-EL-ACP**

**Date of Confidential Document: 4/16/2013**

**Release Date:**

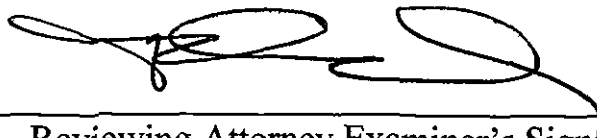
**Page Count: 4**

**Document Description: Confidential version of the Alternative Energy Compliance Report for 2012.**

---

***“Consent to Release to the PUCO DIS Website”***

Name



Reviewing Attorney Examiner's Signature

SEP 21 2017

Date Reviewed \_\_\_\_\_

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician UOZ Date Processed 9/21/17

# CONFIDENTIAL

*Confidential treatment has been requested for the following document:*

*Case: 13-930-EL-ACP*

*Page Count: 4*

*Date Filed: 4/16/2013*

*Filed by: Erika Schmitt*

*Behalf of: Palmco Power OH, LLC*

*Summary of document: Confidential version of the Alternative Energy Compliance Report for 2012.*

RECEIVED-DOCKETING DIV  
2013 APR 16 AM 11:26  
PUCO

RECEIVED-DOCKETING DIV

2013 APR 16 AM 11:27



CUSTOMIZED  
ENERGY SOLUTIONS

April 15, 2013

PUCO

Public Utilities Commission of Ohio  
Docketing Division  
13<sup>th</sup> Floor  
180 East Broad Street  
Columbus, Ohio 43215-3793

Re: Palmco Power OH, LLC 2012 Alternative Energy Portfolio Status Report  
Docket No. 13-0930-EL-ACP

Dear Docketing Division,

Enclosed under seal please find three copies of the confidential version of Palmco Power OH, LLC's 2012 Alternative Energy Portfolio Status Report. The public version of the report was E-filed today under Docket No. 13-0930-EL-ACP. In accordance with Rule 4901-1-24(D) of the Ohio Administrative Code, a motion for protective order has also been filed, and a copy is included with this submission.

Please return a time stamped copy of this cover letter using the self-addressed envelope enclosed. Please also feel free to contact the undersigned with questions or concerns regarding this submission.

Thank you,

Erika Schmitt  
Customized Energy Solutions, Ltd.  
Email: [eschmitt@ces-ltd.com](mailto:eschmitt@ces-ltd.com)  
Phone: 267-331-4242

On behalf of Palmco Power OH, LLC

# CONFIDENTIAL

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

RECEIVED-DOCKETING DIV  
2013 APR 16 AM 11:27  
PUCO

In the Matter of the Annual Alternative Energy )  
Portfolio Status Report for Calendar Year 2012 )  
of Palmco Power OH, LLC )

Case No. 13-0930-EL-ACP

**PALMCO POWER OH, LLC'S  
ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT**

## **I. Introduction**

Palmco Power OH, LLC ("Palmco") is an electric services company as defined within Section 4928.01(A)(9), Revised Code. In accordance with Commission Rules 4901:1-40-03 and 4901:1-40-05 Palmco hereby submits its alternative portfolio status report detailing compliance with the Ohio Alternative Energy Portfolio Standards.

## **II. Baseline Calculation**

- a. Palmco did not make and retail sales during the three preceding calendar years as shown below:

2009 \_\_\_\_\_ 0 \_\_\_\_\_ MWh  
2010 \_\_\_\_\_ 0 \_\_\_\_\_ MWh  
2011 \_\_\_\_\_ 0 \_\_\_\_\_ MWh

- b. Palmco did not begin serving load until June, 2012, and therefore cannot compute a baseline projection in compliance with 4901:1-40-03(B)(2)(a), as the average for the three previous years' sales is 0. In this instance, suppliers are required to determine their baseline as a "reasonable projection of its retail electric sales in the state for a full calendar year." However, as Palmco has never been active in the Ohio Market, Palmco believes that reporting actual retail sales data provides a more accurate figure than a projected baseline, and is consistent with Section 4928.64 (B). Palmco therefore reports as its 2012 baseline for subsequent compliance obligations, total actual sales.

**2012 Baseline: 2,941 MWh**

## **III. Determination of the number of Solar and Non-Solar Renewable Energy Credits (RECs) required and statement of the number of RECs claimed:**

**Table 1: 2012 Obligations**

Types	RECs Required	RECs Obtained	Registry	RECs Sited in Ohio
Solar	2	1	GATS	0, (*Palmco will pay the Alternative Compliance Payment required under 4901:1-40-08(A)(1) within 30 days of the imposition of the

# CONFIDENTIAL

				requirement in accordance with 4901:1-40-08(B))
<b>Non-Solar</b>	42	42	GATS	42
<b>Total</b>	44	43	GATS	42

- a. The REC requirements cited above were determined by multiplying Palmco's actual 2012 load by .06% for solar RECs and 1.44% for non-solar RECs, in order to meet the 1.5% benchmark for total alternative energy procurement.
- b. Palmco has not pursued and does not request a force majeure determination for minimum renewable or solar-energy benchmarks.
- c. All of the RECs used by Palmco for compliance were procured through Palmco's GATS account, as required under 4901:1-40-04(D)(2). RECs used for compliance have been retired.
- d. The number of RECs Sited in Ohio were procured from generation facilities located within the state of Ohio in compliance with 4901:1-40-03(A)(2)(a).

## IV. Compliance

Palmco states that it does not request adjustments for the required number of non-solar and solar RECs permitted pursuant to Rule 4901: 1-40-05(A)(3). Palmco certifies that it will remain compliant with the Alternative Energy Portfolio Standard requirements for annual renewable energy resource benchmarks from solar and non-solar energy sources as demonstrated in Table 1.

## V. Ten Year Forecast

- a. In accordance with Rule 4901:1-40-03(C), Palmco hereby provides a projection for the next ten years of solar and non-solar renewable energy benchmark obligations based on forecast load.

**Table 2: Forecast Compliance Obligations**

Year	Projected Load	Solar RECs	Non-Solar RECs	Total RECs
<b>2013</b>	21884	20	418	438
<b>2014</b>	22978	28	547	574
<b>2015</b>	24127	36	808	844
<b>2016</b>	25334	46	1094	1140
<b>2017</b>	26600	59	1404	1463
<b>2018</b>	27930	73	1743	1815
<b>2019</b>	27930	84	2011	2095
<b>2020</b>	27930	95	2279	2374
<b>2021</b>	27930	106	2547	2653
<b>2022</b>	27930	117	2815	2933

- b. Supply Portfolio Projections

# CONFIDENTIAL

Palmco does not own generation assets that can be used for Ohio compliance and does not purchase bundled electricity. Palmco has and plans to continue to purchase RECs on the spot market on an as needed basis from suppliers who have received renewable energy facility certificates from the Public Utilities Commission of Ohio.

c. Methodology used to evaluate Compliance

Palmco only recently began serving customers in Ohio, and has made projections based on the limited data available. Because customers are free to contract with any CRES or governmental aggregator or receive utility Standard Offer Service, predicting future sales levels is difficult, and therefore Palmco has assumed that load will remain constant after a period of initial growth.

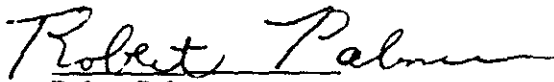
d. Perceived impediments to achieving compliance with required benchmarks

Palmco has no comments at this time.

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER

ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2012

I, Robert Palmese, am a duly authorized representative of Palmco Power OH, LLC, and state to the best of my knowledge and belief that all information contained in the foregoing Annual Alternative Energy Portfolio Status Report for Calendar Year 2012, including any exhibits and attachments, is true, correct and complete.

A handwritten signature in cursive script, appearing to read "Robert Palmese", written in black ink.

Robert Palmese  
Palmco Power OH, LLC