



Staff's Template RPS Compliance Filing Report
2017 Compliance Year

Company Name: First Point Power, LLC

Case Number (i.e., XX-XXXX-EL-ACP): 18-0681-EL-ACP

Point of Contact for RPS Filing – Name: Nathan Field

Point of Contact for RPS Filing – Email: nfield@firstpointpower.com

Point of Contact for RPS Filing – Phone: 401-314-3922

Did the Company have Ohio retail electric sales in 2017?

YES ☒ NO ☐

If a CRES with sales in 2017, confirm the sales were conducted either as a power marketer or retail generation provider (i.e., took title to the electricity).

YES ☒ NO ☐

If this RPS report also addresses the compliance obligation of an additional CRES Provider, list the company(-ies). Otherwise, indicate N/A.

N/A

Note: If the Company indicated zero Ohio retail electric sales in 2017, it need not complete the remainder of this form.

I. Annual RPS Compliance Status Report (refer to Ohio Adm.Code [4901:1-40-05](#))

Note: Please complete Section I in its entirety and without redaction.

A. Baseline Determination

1. SELECT ONE: To determine its compliance baseline, is the Company proposing to use (a) the 3 year average method or (b) compliance year (2017) sales?

☐ (a) the 3 year average method ☒ (b) compliance year (2017) sales

2. 3 Year Average Calculation *(Note: years with zero sales should be excluded from calculation of average)*

Year	Annual Sales (MWHs)
2014	N/A
2015	N/A
2016	N/A
Three Year Average	N/A



Public Utilities Commission

3. Compliance year (2017) sales in MWhs: 116.000
4. Source of reported sales volumes: PJM GENERATION ATTRIBUTE TRACKING
5. For CRES Providers, if the reported sales volume(s) differs from that in the company's CRES Annual Report(s) filed with the Commission, provide an explanation below for the difference. Otherwise, indicate N/A.

N/A

B. Compliance Obligation for 2017

	Required Quantity	Retired Quantity	Tracking System(s)
Solar	0	0	PJM GATS
Non-Solar	4	0	PJM GATS

Note: multiply the proposed baseline by the statutory benchmarks to determine the Required Quantity, with the product rounded to the nearest whole number.

- C. If the Company had a compliance deficiency or compliance excess in a previous year(s) that was rolled forward, describe how that has been incorporated within this filing. Otherwise, indicate N/A.

N/A

- D. Complete and file Staff's compliance worksheet along with filing report.

- E. If the Company is proposing to pay an alternative compliance payment for all or part of its 2017 compliance obligation, enter that amount here: \$ 200.96
Pursuant to Ohio Adm.Code [4901:1-40-08](#), the obligation is rounded up to the next MWh in the event of a compliance payment.



II. Annual RPS Compliance Planning Report (refer to Ohio Adm.Code [4901:1-40-03\(C\)](#))

A. Projected (non-binding) baseline for the current and future calendar years.

Year	Baseline (MWHs)	Non-Solar Requirement	Solar Requirement
2018	340	14.69	0.61
2019	378	19.96	0.83
2020	378	23.59	0.98
2021	358	25.78	1.07
2022	358	29.21	1.22
2023	358	32.65	1.36
2024	358	36.09	1.5
2025	358	39.52	1.65
2026	358	42.96	1.79
2027	358	42.96	1.79

B. Describe the Company's supply portfolio projection, including both generation fleet and power purchases, for the 10 year planning horizon.

As the company does not own generation facilities, the Company plans to purchase supply requirements using swaps settling to the physical for the correct PJM zone. Thus, the company plans to supply power purchases associated with the above baselines on a forward-looking review of obligations combined with the Company's established hedging methodology

C. Describe the methodology used by the Company to evaluate its compliance options.

Company described its renewable compliance plan in its application to become a Competitive Retail Electric Service Provider, including that the Company planned to "comply with any and all renewable portfolio standards in the state of Ohio" and would "procure the necessary renewable certificates to meet such requirements." The Company continues to expect to meet any applicable renewable energy benchmarks with the purchase of Renewable Energy Credits through brokers and bilateral agreements.

D. Describe any perceived impediments to achieving compliance with the required benchmarks, as well as suggestions for addressing any such impediments.

N/A



III. RPS Administration

Please describe any suggestions (non-legislative) the Company may have to make the administration of the Ohio RPS more effective and efficient. Additional communications, enhancements to the [RPS webpage](#), etc.

N/A

**Compliance Plan Status Report for Compliance Year 2017
Summary Sheet**

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data
2014	0	0	0	(A)
2015	0	0	0	(B)
2016	0	0	0	(C)

Baseline for 2017 Compliance Obligation (MWHs)

116

(D) = AvgABC

(Note: If using 2017 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2017 sales are adjusted or not.

i.e., Not Adjusted

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@puco.ohio.gov

3.50%

2017 Statutory Compliance Obligation

2017 Non-Solar Renewable Benchmark

3.35%

(E)

2017 Solar Renewable Benchmark

0.15%

(F)

Per ORC, 4928.64(B)(2)

2017 Compliance Obligation

Non-Solar RECs Needed for Compliance

4

(G) = (D) * (E)

Solar RECs Needed for Compliance

0

(H) = (D) * (F)

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

Non-Solar (RECs)

0

(I)

Solar (S-RECs)

0

(J)

Total 2017 Compliance Obligations

Non-Solar RECs Needed for Compliance

4

(K) = (G) + (I)

Solar RECs Needed for Compliance

0

(L) = (H) + (J)

2017 Retirements (Per GATS and/or MRETS Data)

Non-Solar (RECs)

0

(M)

Solar (S-RECs)

0

(N)

Under Compliance in 2017, if applicable

Non-Solar (RECs)

4

(O) = (K) - (M)

Solar (S-RECs)

0

(P) = (L) - (N)

2017 Alternative Compliance Payments

Non-Solar, per REC (Refer to Case 17-0531-EL-ACP)

\$50.24

(Q)

Solar, per S-REC - per 4928.64(C)(2)(a)

\$250.00

(R)

2017 Payments, if applicable

Non-Solar Total

\$200.96

(S) = (O) * (Q)

Solar Total

\$0.00

(T) = (P) * (R)

TOTAL

\$200.96

(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 **2017** 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@puco.ohio.gov*

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/16/2018 10:41:09 AM

in

Case No(s). 18-0681-EL-ACP

Summary: Application In the matter of the Annual RPS compliance reporting as contained in Chapter 4901:1-40. electronically filed by Mr. Nathan T Field on behalf of First Point Power, LLC