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Ohio Public Utility Commission
Docketing Division
180 East Broad Street
Columbus, OH 43215

PUCO

2019 APR 12 AM 11:22

RECEIVED-DOCKETING DIV

April 12, 2019

RE: Docket No. 19-0735-EL-ACP - Direct Energy Services, LLC's Annual Renewable Portfolio Standards Compliance Filing for 2018 - PUBLIC VERSION

Dear Commission:

Pursuant to RSP Rules 4901:1-40-05 OAC & 4901:1-40-03(C) OAC- regarding annual renewable portfolio standard reporting and filing, please find enclosed the Public Version of the 2018 annual compliance filing of Direct Energy Services, LLC. A confidential version of this filing is being filed under protective order by Whitt Sturtevant LLP Law Firm.

If you should have questions regarding this filing, please do not hesitate to contact me directly.

Best Regards,

Barbara Farmer

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Technician DMm Date Processed 04/12/19

Staff's Template RPS Compliance Filing Report 2018 Compliance Year

Company Name: Direct Energy Services, LLC
Case Number (i.e., XX-XXXX-EL-ACP): 19-0735-EL-ACP
Point of Contact for RPS Filing – Name: Barbara Farmer
Point of Contact for RPS Filing – Email: barbara.farmer@directenergy.com
Point of Contact for RPS Filing – Phone: (713)354-4710

Did the Company have Ohio retail electric sales in 2018? YES ☒ NO ☐

If a CRES with sales in 2018, 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.

Note: If the Company indicated zero Ohio retail electric sales in 2018, 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 (2018) sales?

☐ (a) the 3 year average method ☒ (b) compliance year (2018) sales

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

Year	Annual Sales (MWHs)
2015	775,614
2016	852,881
2017	867,188
Three Year Average	831,895

3. Compliance year (2018) sales in MWHs: 880,332

4. Source of reported sales volumes: Billing System

5. For CRES Providers: if the reported sales volume(s) differs from that in the company's CRES Annual Report(s) for Fiscal Assessment filed with the Commission, provide an explanation below for the difference. Otherwise, indicate N/A.

N/A

B. Compliance Obligation for 2018

	Required Quantity	Retired Quantity	Tracking System(s)
Solar	38,030	38,030	GATS
Non-Solar	1,585	1,585	MRETS

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 2018 compliance obligation, enter that amount here: \$ 0.00
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
2019			
2020			
2021			
2022			
2023			
2024			
2025			
2026			
2027			
2028			

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

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

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

None

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.

None

**Compliance Plan Status Report for Compliance Year 2018
Summary Sheet**

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data
2015	775,614	0	775,614	Billing system (A)
2016	852,881	0	852,881	Billing system (B)
2017	867,188	0	867,188	Billing system (C)

Baseline for 2018 Compliance Obligation (MWHs)

880,332

Not Adjusted

(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

4.50%	2018 Statutory Compliance Obligation		
	2018 Non-Solar Renewable Benchmark	4.32%	(E)
	2018 Solar Renewable Benchmark	0.18%	0.0018 (F)
	Per ORC, 4928.64(B)(2)		
	2018 Compliance Obligation		
	Non-Solar RECs Needed for Compliance	38,030	(G) = (D) * (E)
	Solar RECs Needed for Compliance	1,585	(H) = (D) * (F)
	Carry-Over from Previous Year(s), if applicable		
	Non-Solar (RECs)	0	(I)
	Solar (S-RECs)	0	(J)
	Total 2018 Compliance Obligations		
	Non-Solar RECs Needed for Compliance	38,030	(K) = (G) + (I)
	Solar RECs Needed for Compliance	1,585	(L) = (H) + (J)
	2018 Retirements (Per GATS and/or MRETS Data)		
	Non-Solar (RECs)	38,030	(M)
	Solar (S-RECs)	1,585	(N)
	Under Compliance in 2018, if applicable		
	Non-Solar (RECs)	0	(O) = (K) - (M)
	Solar (S-RECs)	0	(P) = (L) - (N)
	2018 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)
	2018 Payments, if applicable		
	Non-Solar Total	\$0.00	(S) = (O) * (Q)
	Solar Total	\$0.00	(T) = (P) * (R)
	TOTAL	\$0.00	(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 2018 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

Direct Energy Business Marketing, LLC (Energy America) - My RPS Compliance - OH - Jan 2018 - Dec 2018

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Delete	Total Generation for Subaccount	OH Solar Renewable	OH Certificates Used for RPS
Direct Energy Business Marketing, LLC (Energy America)	Default	AEP Ohio	266,253	263,693		11,391	0	11,391
Direct Energy Business Marketing, LLC (Energy America)	Default	DAY	555,438	131,032		5,661	0	5,661
Direct Energy Business Marketing, LLC (Energy America)	Default	DEOK	220,698	217,999		9,418	0	9,418
Direct Energy Business Marketing, LLC (Energy America)	Default	FEOH	257,813	267,608		11,560	0	11,560
Total			1,300,202	880,332		38,030	0	38,030

Direct Energy Business Marketing, LLC (Energy America) - Subaccount Details - OH - Jan 2018 - Dec 2018

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar	OH Renewable	RPS Price	RPS Period
Default	AEP Ohio	02/2017	NON41034	Central Utility Plant - CTG2	OH	WH	2733576 - 6097 to 6453	357	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	AEP Ohio	03/2017	NON41033	Central Utility Plant - CTG1	OH	WH	2794604 - 1 to 5394	5,394	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	AEP Ohio	03/2017	NON41034	Central Utility Plant - CTG2	OH	WH	2812474 - 1 to 5640	5,640	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	DAY	02/2017	NON41033	Central Utility Plant - CTG1	OH	WH	2707216 - 1 to 5661	5,661	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	DEOK	01/2017	NON41033	Central Utility Plant - CTG1	OH	WH	2664343 - 7333 to 7357	25	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	DEOK	01/2017	NON41034	Central Utility Plant - CTG2	OH	WH	2685053 - 5031 to 7404	2,374	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	DEOK	02/2017	NON41033	Central Utility Plant - CTG1	OH	WH	2707216 - 5662 to 6584	923	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	DEOK	02/2017	NON41034	Central Utility Plant - CTG2	OH	WH	2733576 - 1 to 6096	6,096	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	FEOH	03/2017	NON41034	Central Utility Plant - CTG2	OH	WH	2812474 - 5641 to 6054	414	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	FEOH	04/2017	NON41033	Central Utility Plant - CTG1	OH	WH	2890169 - 1 to 5884	5,884	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Default	FEOH	04/2017	NON41034	Central Utility Plant - CTG2	OH	WH	2924748 - 1 to 5262	5,262	14-WER-OH-GATS-0612		Yes	\$6.25	2018
Total								38,030					

Direct Energy Business Marketing, LLC (Energy America) - Subaccount Details - OH - Jan 2018 - Dec 2018

Deposit Date
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