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April 12, 2019

Ms. Barcy F. McNeal  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

Re: *In re Inspire Energy Holdings, LLC*, Case No. 19-0857-EL-ACP

Dear Ms. McNeal:

In accordance with Ohio Admin. Code 4901:1-40-05 and 4901:1-40-03(C) regarding annual renewable portfolio standard reporting and filing, please find enclosed the executed compliance filing of Inspire Energy Holdings, LLC.

The baseline projections requested for the Annual RPS Compliance Planning Report (Section II.A, page 3) are confidential and sensitive. This information is redacted in the public docketed version of this report, and a confidential version has been filed under seal.

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

Respectfully submitted,

/s/ Rebekah J. Glover

Rebekah J. Glover  
Counsel for Inspire Energy Holdings, LLC

**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	0	0	0	Internal actuals	(A)
2016	240	0	240	Internal actuals	(B)
2017	3,690	0	3,690	Internal actuals	(C)
<b>Baseline for 2018 Compliance Obligation (MWHs)</b>			1,965		(D) = AvgABC
<i>(Note: If using 2018 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2018 sales are adjusted or not.</i>					<b>i.e., Not Adjusted</b>
4.50%	<b>2018 Statutory Compliance Obligation</b>				
	2018 Non-Solar Renewable Benchmark		4.32%		(E)
	2018 Solar Renewable Benchmark		0.18%		(F)
	Per ORC, 4928.64(B)(2)				
	<b>2018 Compliance Obligation</b>				
	Non-Solar RECs Needed for Compliance		85		(G) = (D) * (E)
	Solar RECs Needed for Compliance		4		(H) = (D) * (F)
	<b>Carry-Over from Previous Year(s), if applicable</b>				
	Non-Solar (RECs)		0		(I)
	Solar (S-RECs)		0		(J)
	<b>Total 2018 Compliance Obligations</b>				
	Non-Solar RECs Needed for Compliance		85		(K) = (G) + (I)
	Solar RECs Needed for Compliance		4		(L) = (H) + (J)
	<b>2018 Retirements (Per GATS and/or MRETS Data)</b>				
	Non-Solar (RECs)		85		(M)
	Solar (S-RECs)		4		(N)
	<b>Under Compliance in 2018, if applicable</b>				
	Non-Solar (RECs)		0		(O) = (K) - (M)
	Solar (S-RECs)		0		(P) = (L) - (N)
	<b>2018 Alternative Compliance Payments</b>				
	Non-Solar, per REC (Refer to Case 18-0730-EL-ACP)		\$51.31		(Q)
	Solar, per S-REC See 4928.64(C)(2)(a)		\$250.00		(R)
	<b>2018 Payments, if applicable</b>				
	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. If the Company is proposing to pay an alternative compliance payment, please refer to OAC 4901:1-40-08 regarding the rounding of obligations. Questions concerning this worksheet can be addressed to Stuart.Siegfried@puco.ohio.gov*

## Staff's Template RPS Compliance Filing Report 2018 Compliance Year

Company Name: Inspire Energy Holdings, LLC

Case Number (i.e., XX-XXXX-EL-ACP): 19-0857-EL-ACP

Point of Contact for RPS Filing – Name: Aaron Jacobs-Smith

Point of Contact for RPS Filing – Email: regulatory@helloinspire.com

Point of Contact for RPS Filing – Phone: (831) 359-5444

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.

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	0
2016	240
2017	3,690
Three Year Average	1,965

3. Compliance year (2018) sales in MWHs: 31,268

4. Source of reported sales volumes: Internal actuals

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	4	4	PJM GATS
Non-Solar	85	85	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 2018 compliance obligation, enter that amount here: \$  
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.**

We expect to procure energy associated with our baseline projections through PJM ISO. We do not expect impediments to our ability to procure the needed energy.

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

Generally, Inspire purchases RECs and S-RECs on the open market to satisfy its RPS requirements. Inspire does not have near-term plans to purchase generation capacity.

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

Inspire does not expect to face impediments to its compliance with Ohio RPS obligations.

### 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.

Inspire does not have any suggestions. Inspire appreciates the PUCO staff RPS guidance, making compliance clear and straightforward.

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/12/2019 12:40:07 PM**

**in**

**Case No(s). 19-0857-EL-ACP**

Summary: Text In the Matter of the RPS Compliance Report for Calendar Year 2018  
electronically filed by Ms. Rebekah J. Glover on behalf of Inspire Energy Holdings, LLC