

Staff's Template RPS Compliance Filing Report 2018 Compliance Year

Company Name: Hudson Energy Services, LLC
Case Number (i.e., XX-XXXX-EL-ACP): 19-0886-EL-ACP
Point of Contact for RPS Filing – Name: Bernie Kinsella
Point of Contact for RPS Filing – Email: bkinsella@justenergy.com
Point of Contact for RPS Filing – Phone: 713-933-0887

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	187,517
2016	389,427
2017	524,590
Three Year Average	367,178

3. Compliance year (2018) sales in MWHs: 575,559,314

4. Source of reported sales volumes: CRES Annual Report

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	661	661	PJM-GATS
Non-Solar	15,862	15,862	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.

Hudson Energy purchases supply based upon short-term annual contracts.

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

Hudson Energy is not developing and does not own renewable generation assets that would qualify under the Ohio RPS program. Instead, Hudson Energy purchases renewable energy under third-party contractual agreements to meet its RPS procurement obligations. Hudson Energy will purchase renewable energy on an annual basis based upon projected sales, hedging against risks with other procurement options. This procurement process will account for the various portfolio content category requirements and will insure that Hudson Energy has sufficient procurement from each portfolio content category to satisfy the requirements in accordance with Ohio law (Revised Code Section 4928.64). After the end of each year and each compliance period Hudson Energy will true up its purchases and re-evaluate its retail sales data, to help ensure it will purchase and procure sufficient renewable energy to meet its sales data, to help ensure

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

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.

Hudson Energy Services, LLC - 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	OH Renewable	Total Certificates Used for RPS
Hudson Energy Services, LLC	Default	AEP Ohio	132,424			16,523	661	15,862	16,523
Hudson Energy Services, LLC	Default	DAY	29,863			0	0	0	0
Hudson Energy Services, LLC	Default	DEOK	37,031			0	0	0	0
Hudson Energy Services, LLC	Default	FEOH	382,923			0	0	0	0
Total			582,241	0		16,523	661	15,862	16,523

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	187,517	0	187,517	2017 Status Report (A)
2016	389,427	0	389,427	2017 Status Report (B)
2017	500,457	0	524,590	(C)

Baseline for 2018 Compliance Obligation (MWHs)

367,178

(D) = AvgABC

(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.e., Not Adjusted

4.50%

2018 Statutory Compliance Obligation

2018 Non-Solar Renewable Benchmark

4.32%

(E)

2018 Solar Renewable Benchmark

0.18%

(F)

Per ORC, 4928.64(B)(2)

2018 Compliance Obligation

Non-Solar RECs Needed for Compliance

15,862

(G) = (D) * (E)

Solar RECs Needed for Compliance

661

(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

15,862

(K) = (G) + (I)

Solar RECs Needed for Compliance

661

(L) = (H) + (J)

2018 Retirements (Per GATS and/or MRETS Data)

Non-Solar (RECs)

15,862

(M)

Solar (S-RECs)

661

(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 18-0730-EL-ACP)

\$51.31

(Q)

Solar, per S-REC See 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. 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*

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Case No(s). 19-0886-EL-ACP

Summary: Report PUBLIC 2018 Alternative Energy Portfolio Status Report electronically filed by Mrs. Gretchen L. Petrucci on behalf of Hudson Energy Services, LLC