

FILE



**Direct  
Energy®**

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

**RECEIVED**

**APR 12 2019**

DOCKETING DIVISION  
Public Utilities Commission of Ohio

April 12, 2019

RE: **Docket No. 19-0736-EL-ACP - Direct Energy Business Marketing, LLC's Annual Renewable Portfolio Standards Compliance Filing for 2018**

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 2018 annual compliance filing of Direct Energy Business Marketing, LLC.

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

Best Regards,

Barbara Farmer

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 LOAN Date Processed 4/15/19

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

Company Name: Direct Energy Business Marketing, LLC  
Case Number (i.e., XX-XXXX-EL-ACP): 17-0736-EL-ACP  
Point of Contact for RPS Filing – Name: Barbara Farmer  
Point of Contact for RPS Filing – Email: barbara.farmer@directenergy  
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. 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	
2016	
2017	
Three Year Average	

3. Compliance year (2018) sales in MWHs:

4. Source of reported sales volumes:

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.

**B. Compliance Obligation for 2018**

	Required Quantity	Retired Quantity	Tracking System(s)
Solar			
Non-Solar			

*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.

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.**

<b>Year</b>	<b>Baseline (MWHs)</b>	<b>Non-Solar Requirement</b>	<b>Solar Requirement</b>
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.**

### **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.**

**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	952,136	0	952,136	Billing system (A)
2016	838,727	0	838,727	Billing system (B)
2017	88,036	0	88,036	Billing system (C)

Baseline for 2018 Compliance Obligation (MWhs)

0

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

2018 Solar Renewable Benchmark

Per ORC, 4928.64(B)(2)

4.32%

0.18%

0.0018 (F)

2018 Compliance Obligation

Non-Solar RECs Needed for Compliance

0

(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 2018 Compliance Obligations

Non-Solar RECs Needed for Compliance

0

(K) = (G) + (I)

Solar RECs Needed for Compliance

0

(L) = (H) + (J)

2018 Retirements (Per GATS and/or MRETS Data)

Non-Solar (RECs)

0

(M)

Solar (S-RECs)

0

(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)

\$51.31

(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