

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Alternative :  
Energy Portfolio Status Report of Talen :  
Energy Marketing, LLC :  
: Case No. 19-0929-EL-ACP  
In the Matter of Talen Energy Marketing, :  
LLC's Plan for Compliance with :  
Advanced and Renewable Energy :  
Benchmarks :

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**TALen ENERGY MARKETING, LLC'S  
ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT  
AND  
PLAN FOR COMPLIANCE WITH ADVANCED AND RENEWABLE ENERGY  
BENCHMARKS (Public Version)**

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**I. INTRODUCTION**

Talen Energy Marketing, LLC<sup>1</sup> ("Talen") is a competitive retail electric service ("CRES") provider, as defined in Revised Code §4928.01(A)(4), and an electric service company, as defined in Rev. Code §4928.01(A)(9), having been issued Certificate No. 13-693E(2) by the Public Utilities Commission of Ohio (the "Commission"). Talen provides electric supply to commercial customers throughout the State of Ohio.

Pursuant to Rev. Code §4928.64 and Admin. Code 4901:1-40-03 and 4901:1-40-05, all Ohio electric service companies are required to file, by April 15<sup>th</sup> of each year, an annual alternative energy portfolio status report and plan for compliance with advanced and renewable energy benchmarks. In this report, electric service companies are required to analyze "all activities undertaken in the previous calendar year to demonstrate how the applicable alternative energy

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<sup>1</sup> Formerly, PPL EnergyPlus, LLC.

portfolio benchmarks and planning requirements have or will be met.”<sup>2</sup> To meet these requirements, Talen submits the following report which identifies: (a) its 2018 baseline; and (b) compliance with its 2018 renewable energy and solar energy benchmarks. Finally, Talen submits its plan for compliance with future annual advanced and renewable energy benchmarks, as required by Admin. Code 4901:1-40-03(C).

## **II. ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT**

For calendar year 2018, Rev. Code §4928.64(B)(2) requires electric service companies to demonstrate that 4.5% of the retail electricity sold was derived from renewable energy resources. Additionally, 0.18% of the electricity sold by electric service companies must have been generated by solar energy resources, which portion may also be counted toward the renewable energy resources target. The level of these benchmark requirements is determined by first establishing a baseline number of kilowatt hours and then applying the benchmark percentages to that baseline.

If an electric service company has not been continuously supply Ohio retail electric customers during the preceding three (3) calendar years, the baseline may be computed as an average of annual sales data for all calendar years during the preceding three years in which the electric services company has been selling electricity in Ohio. Admin. Code 4901:1-40-03(B)(2)(a). In addition to the computation methodologies enumerated in 4901:1-40-03(B), Rev. Code §4928.643(B) provides an electric services company with the option of utilizing as its baseline the total kilowatt hours sold to applicable customers in the applicable compliance year.

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<sup>2</sup> Admin. Code 4901:1-40-05(A).

Pursuant to Rev. Code §4928.643(B), Talen has elected to utilize the total kilowatt hours sold to its customers in 2018 to determine its baseline. Talen's sales for 2018 were 58,993 MWh. Accordingly, Talen's baseline for 2018 is 58,993 MWh.

Talen submits that it met its benchmark obligations for the 2018 compliance year. Talen's Compliance Plan Status Report Summary Sheet for 2018 demonstrating said compliance is attached hereto as Attachment 1.

**III. PLAN FOR COMPLIANCE WITH FUTURE ANNUAL ADVANCED RENEWABLE ENERGY BENCHMARKS**

**A. Baseline for Future Years**

Admin. Code 4901:1-40-03(C) requires each electric services company to file an annual plan for compliance with future annual advanced and renewable energy benchmarks, including solar, utilizing at least a ten-year planning horizon. Such plan must at a minimum include: (1) a baseline for current and future calendar years; (2) a supply portfolio projection, including both generation fleet and power purchases; (3) a description of the methodology used by the company to evaluate its compliance options; and (4) a discussion of perceived impediments to achieving compliance with required benchmarks, as well as suggestions for addressing any such impediments.

Talen respectfully submits a redacted version of Attachment 2, its projected baselines for the next ten years. An unredacted version of Attachment 2 will be submitted under seal along with a Motion for Protective Order. These projections are based on Talen's 2018 sales and contracted load combined with its historical win rate applied to opportunities currently being pursued.

**B. Supply Portfolio Projection, including both Generation Fleet and Power Purchases**

Talen neither owns nor has plans to construct or purchase electric generation assets. It is Talen's plan to continue to supply power to its customers by purchasing power in the wholesale market.

**C. Description of Methodology Used to Evaluate Compliance Options**

Because Talen does not and will not own or control generation assets, it plans to meet its alternative energy benchmarks by purchasing RECs and SRECs. Talen will annually transfer the appropriate RECs and SRECs into its GATS reserve subaccount between March 1 and April 15 in order to precede the filing of its Ohio annual compliance report with the Commission.

**D. Uncertainties Regarding Achievement of Benchmarks**

Talen has no comments at this time.

**IV. CONCLUSION**

Based on the matters discussed herein and the Attachments submitted herewith, Talen Energy Marketing, LLC respectfully requests that the Commission find that it has satisfied its compliance obligations with respect to the 2015 renewable and solar energy benchmarks.

Respectfully submitted,

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# ATTACHMENT 1

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

Sales		Proposed		Sales		Source of	
Unadjusted (MWHs)		Adjustments (MWHs)		Adjusted (MWHs)		Sales Volume Data	
2015		0		0			(A)
2016		0		0			(B)
2017		0		0			(C)
Baseline for 2018 Compliance Obligation (MWHs)					58,993	(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			2,548		(G) = (D) * (E)	
	Solar RECs Needed for Compliance			106		(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			2,548		(K) = (G) + (I)	
	Solar RECs Needed for Compliance			106		(L) = (H) + (J)	
2018 Retirements (Per GATS and/or MRETS Data)							
	Non-Solar (RECs)			2,548		(M)	
	Solar (S-RECs)			106		(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

## PUBLIC VERSION

### REDACTED ATTACHMENT 2

**This Attachment contains confidential, proprietary and trade secret information and the unredacted version is being submitted under seal with a Motion for Protective Order**

Year	Projected Baseline (MWh)	Annual Benchmarks (%)		Projected Annual Benchmarks (MWh)		
		Renewable	Solar	Total Renewable	Solar	Total Renewable less Solar
2019		5.5	.12			
2020		6.5	.15			
2021		7.5	.18			
2022		8.5	.22			
2023		9.5	.26			
2024		10.5	.30			
2025		11.5	.34			
2026		12.5	.38			
2027		12.5	.42			
2028		12.5	.46			
2029		12.5	.5			

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

**Commission of Ohio Docketing Information System on**

**4/15/2019 12:35:57 PM**

**in**

**Case No(s). 19-0929-EL-ACP**

Summary: Text Talen Energy Marketing, LLC's 2018 Annual Alternative Energy Portfolio Status Report and Plan for Compliance with Advanced and Renewable Energy Benchmarks.(Public Version) electronically filed by Mr. Robert Dove on behalf of Talen Energy Marketing, LLC