

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Annual Alternative )  
Energy Portfolio Status Report of Dynegy ) Case No. 19-0901-EL-ACP  
Energy Services (East), LLC. )

In the Matter of the Report of Dynegy Energy )  
Services (East), LLC, Concerning its Plan for )  
Compliance with Advanced and Renewable )  
Energy. )

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**DYNEGY ENERGY SERVICES (EAST), LLC’S  
ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT  
AND  
PLAN FOR COMPLIANCE WITH FUTURE ANNUAL ADVANCED  
AND RENEWABLE ENERGY BENCHMARKS**

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**I. INTRODUCTION**

Dynegy Energy Services (East), LLC (“DES-East”) is certified by the PUCO as a Competitive Retail Electric Service Provider in Ohio (PUCO Case No. 04-1323; Certificate No. 04-124E(8)), and in 2018 DES-East sold retail electricity in Ohio as a power marketer.

Pursuant to R.C. 4928.64 and Ohio Administrative Code (O.A.C) Rule 4901:1-40-05, all Ohio electric service companies are required to file, by April 15 of each year, an annual alternative energy portfolio status report. 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 portfolio benchmarks and planning requirements have or will be met.”<sup>1</sup> The annual review is to include compliance with the most recent applicable renewable energy and solar energy resource benchmarks. In addition, O.A.C. Rule 4901:1-40-03(C) requires that all

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<sup>1</sup> O.A.C. Rule 4901:1-40-05(A).

Ohio electric service companies file a “plan for compliance with future annual advanced- and renewable-energy benchmarks” also by April 15 of each year.<sup>2</sup>

To meet these requirements, DES-East submits the following report, which:

- Identifies its 2018 baseline;
- Identifies its 2018 renewable energy and solar energy benchmarks and demonstrates its compliance with those benchmarks; and
- Provides its plan for compliance with future annual advanced and renewable energy benchmarks, as required by O.A.C. Rule 4901:1-40-03(C).

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

Pursuant to R.C. 4928.64(B)(2), for the year 2018, electric service companies must demonstrate that four and a half percent (4.5%) of the retail electricity sold was derived from renewable energy resources. In addition, 0.18 percent of the electricity sold must have been generated by solar energy resources, which portion may also be counted toward the renewable requirement. The level of these benchmark requirements is determined by first calculating a baseline number of kilowatt hours and then applying the benchmark percentages to that baseline.

### **A. Baseline Calculation**

An electric service company’s baseline may be based on the total kilowatt hours sold to retail electric consumers located within this state in the applicable compliance year. DES-East’s actual 2018 calendar year total unadjusted kilowatt hours of electricity sold to retail electricity consumers located in Ohio was 12,274,326 MWHs.

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<sup>2</sup> O.A.C. Rule 4901:1-40-03(C)

## **B. Renewable and Solar Energy Benchmarks**

The 2018 compliance baseline and benchmark requirement calculations are as follows:

Solar Requirement	0.18%
Non-Solar Requirement	4.32%
Overall Requirement	4.50%
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Solar RECs (SRECS) Required	22,094
Non-Solar RECs Required	530,251
Total RECs Required	552,345

## **C. Demonstration of Compliance with Renewable Energy Benchmarks**

Pursuant to R.C. 4928.65, electric service companies may meet their renewable energy benchmarks through the use of renewable energy credits (RECs). DES-East successfully met its renewable energy benchmarks using RECs acquired through market purchases. DES-East appropriately maintained, and DES-East continues to maintain, such RECs in its Generation Attributes Tracking System (GATS) account.

## **D. Summary of DES-East's Compliance Strategy**

DES-East's renewable energy source compliance strategy is to purchase the required RECs and S-RECs in the market. DES-East also intends to respond to Requests for Proposals (RFPs) for the purchase of renewable energy resources where appropriate.

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

## **A. Baseline for Future Calendar Years**

DES-East is unable to forecast its baseline for future calendar years with any confidence because of the evolving nature of the retail electricity market in Ohio. In addition, although DES-East will continue to establish new customer contracts, many of those contracts are short in duration and competition in Ohio is increasing.

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

DES-East does not own, and has no plans to construct or purchase, any electric generation facilities. Therefore, DES-East will continue to supply power to its customers by purchasing power through market brokers, RFPs, and third party contracts.

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

As noted above, DES-East does not own or anticipate owning any generation facilities. Therefore, DES-East will meet its alternative energy benchmarks through purchases of RECs and S-RECs. DES-East is unable to provide a more detailed description of its compliance methodology, due to regulatory uncertainty of the renewable energy market, but will continue to explore alternative compliance opportunities.

**D. Impediments to Achieving Compliance with Benchmarks**

DES-East has not identified any impediments to achieving compliance with the benchmarks.

**IV. CONCLUSION**

Based on the foregoing, DES-East respectfully requests that this Commission find that DES-East satisfactorily complied with its 2018 renewable energy compliance requirements.

April 15, 2019

Respectfully submitted,

*/s David F. Proaño*

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David F. Proaño (0078838) (*Counsel of Record*)

[dproano@bakerlaw.com](mailto:dproano@bakerlaw.com)

Kendall Kash (0093717)

[kkash@bakerlaw.com](mailto:kkash@bakerlaw.com)

BAKER & HOSTETLER LLP

127 Public Square, Suite 2000

Cleveland, Ohio 44114

Phone: 216-861-7834

Fax: 216-696-0740

*Counsel for Dynegy Energy Services (East), LLC*

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Summary: Annual Report Dynegy Energy Services (East), LLC's Annual Alternative Energy Portfolio Status Report electronically filed by Mr. David F. Proano on behalf of Dynegy Energy Services (East), LLC