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April 12, 2019

Via Federal Express

The Public Utilities Commission of Ohio  
Attention: Docketing Division  
180 East Broad Street  
Columbus, OH 43215

PUCO

2019 APR 15 AM 10:41

RECEIVED-DOCKETING DIV

Re: 19-0879- EL-ACP - Renewable Portfolio Standard (RPS) Compliance Filing

To whom this may concern:

Enclosed please find National Gas & Electric, LLC's ("NGE") 2019 RPS Compliance Filing. We believe the report is complete in all respects.

Should you have any questions or need additional information, please contact me at (281) 456-3312 or at [vshowers@ngande.com](mailto:vshowers@ngande.com).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Vernetta Showers", is written over the typed name.

Vernetta Showers  
Compliance Manager

Enclosure

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 MN Date Processed APR 15 2019

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

Company Name: National Gas & Electric, LLC  
Case Number (i.e., XX-XXXX-EL-ACP): 19-0879-EL-ACP  
Point of Contact for RPS Filing – Name: Vernetta Showers  
Point of Contact for RPS Filing – Email: vshowers@ngande.com  
Point of Contact for RPS Filing – Phone: 281-456-3312

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	26,038
2017	44,437
Three Year Average	35,238

3. Compliance year (2018) sales in MWHs:

4. Source of reported sales volumes: Customer Billing Data from Utilities
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)
<b>Solar</b>	63	63	GATS
<b>Non-Solar</b>	1,522	1,522	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.**

<b>Year</b>	<b>Baseline (MWHs)</b>	<b>Non-Solar Requirement</b>	<b>Solar Requirement</b>
2019	31,522	1,734	69
2020	32,153	2,090	84
2021	32,796	1,460	98
2022	33,451	2,843	114
2023	34,121	3,241	130
2024	34,803	3,654	146
2025	35,499	4,082	163
2026	36,209	4,526	181
2027	36,933	4,617	185
2028	37,672	4,709	188

**B. Describe the Company's supply portfolio projection, including both generation fleet and power purchases, for the 10 year planning horizon.**

The Company does not have plans to purchase generation and will purchase power as we grow our customer base in line with our internal hedging policies.

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

The Company purchases RECs in the OTC market using brokerage services as long as the RECs can be purchased at a price less than the ACP.

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

N/A

### **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	0	0	0		(A)
2016	0	0	26,038		(B)
2017	0	0	44,437		(C)
<b>Baseline for 2018 Compliance Obligation (MWHs)</b>			35,238		(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. <span style="border: 1px solid black; padding: 2px;">i.e., Not Adjusted</span> )					
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		1,522		(G) = (D) * (E)
	Solar RECs Needed for Compliance		63		(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		1,522		(K) = (G) + (I)
	Solar RECs Needed for Compliance		63		(L) = (H) + (J)
	<b>2018 Retirements (Per GATS and/or MRETS Data)</b>				
	Non-Solar (RECs)		1,522		(M)
	Solar (S-RECs)		63		(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*

# National Gas & Electric, LLC (PPL) - Subaccount Details - OH - Jan 2018 - Dec 2018

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar
Default	AEP Ohio	11/2015	NON58393	Bryan Municipal Utilities Solar - Bryan Municipal Utilities Solar	OH	SUN	1758864 - 120 to 120	1	11-SPV-OH-GATS-2511	Yes
Default	AEP Ohio	11/2016	NON58393	Bryan Municipal Utilities Solar - Bryan Municipal Utilities Solar	OH	SUN	2526296 - 42 to 56	15	11-SPV-OH-GATS-2511	Yes
Default	AEP Ohio	12/2016	NON58393	Bryan Municipal Utilities Solar - Bryan Municipal Utilities Solar	OH	SUN	2599080 - 1 to 5	5	11-SPV-OH-GATS-2511	Yes
Default	AEP Ohio	01/2017	MSET89634101	Belleville - 1	WV	WAT	2655469 - 14728 to 14777	50	10-HYD-WV-GATS-0040	
Default	AEP Ohio	12/2016	NON79132	Benton County Wind Farm LLC - Benton County Wind Farm	IN	WND	2593739 - 16835 to 17285	451	10-WND-IN-GATS-0213	
Default	DAY	11/2015	NON58393	Bryan Municipal Utilities Solar - Bryan Municipal Utilities Solar	OH	SUN	1758864 - 121 to 133	13	11-SPV-OH-GATS-2511	Yes
Default	DAY	12/2016	NON79132	Benton County Wind Farm LLC - Benton County Wind Farm	IN	WND	2593739 - 17286 to 17601	316	10-WND-IN-GATS-0213	
Default	DEOK	11/2015	NON58393	Bryan Municipal Utilities Solar - Bryan Municipal Utilities Solar	OH	SUN	1758864 - 134 to 162	29	11-SPV-OH-GATS-2511	Yes
Default	DEOK	12/2016	NON79132	Benton County Wind Farm LLC - Benton County Wind Farm	IN	WND	2593739 - 17602 to 18306	705	10-WND-IN-GATS-0213	
Total								1,585		

# National Gas & Electric, LLC (PPL) - Subaccount Details - OH - Jan 2018 - Dec 2018

OH Renewable	RPS	RPS Price	RPS Period	Deposit Date
	Yes	\$5.25	2018	04/11/2019
	Yes	\$5.25	2018	04/11/2019
	Yes	\$5.25	2018	04/11/2019
Yes	Yes	\$5.90	2018	04/11/2019
Yes	Yes	\$5.90	2018	04/11/2019
	Yes	\$5.25	2018	04/11/2019
Yes	Yes	\$5.90	2018	04/11/2019
	Yes	\$5.25	2018	04/11/2019
Yes	Yes	\$5.90	2018	04/11/2019
	Yes	\$5.25	2018	04/11/2019
Yes	Yes	\$5.90	2018	04/11/2019



**National Gas & Electric, LLC (PPL) - 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 Renewable	OH Renewable	Total Certificates Used for RPS
National Gas & Electric, LLC (PPL)	Default	AEP Ohio	8,769			522	21	501	522
National Gas & Electric, LLC (PPL)	Default	DAY	5,631			329	13	316	329
National Gas & Electric, LLC (PPL)	Default	DEOK	12,427			734	29	705	734
<b>Total</b>			<b>26,827</b>	<b>0</b>		<b>1,585</b>	<b>63</b>	<b>1,522</b>	<b>1,585</b>