KRAVITZ, BROWN & DORTCH, LLC

Attorneys at Law

7

Justin M. Dortch ddial: 614-545-5371 dfax: 614-464-2002 jdortch@kravitzllc.com

65 East State Street - Suite 200 Columbus, Ohio 43215-4277 614-464-2000 fax 614-464-2002

2019 APR 15 AM 11:5

PUCO

RECEIVED-DOCKETING DIV

April 15, 2019

Ms. Barcy F. McNeal, Secretary Public Utilities Commission of Ohio 180 East Broad Street Columbus, Ohio 43215

> Re: Case No. 19-0882 -EL-ACP Calpine Energy Solutions, LLC <u>Public Version of Alternative Energy Resource Portfolio Report for 2018</u>

Dear Ms. McNeal:

On behalf of Calpine Energy Solutions, LLC ("Calpine Solutions"), I am submitting a public version of Calpine Solution's Alternative Energy Resource Portfolio Report ("AERP") for 2018. A motion for protective order was also filed today and a confidential version of this report is being submitted under seal.

Very truly yours,

Justin M. Dortch

cc: Michael Dortch, Esq. Bryan White

Staff's Template RPS Compliance Filing Report 2018 Compliance Year

Company Name: Calpine Energy Solutions, LLC Case Number (i.e., XX-XXXX-EL-ACP): Point of Contact for RPS Filing – Name: Bryan White Point of Contact for RPS Filing – Email: bryan.white@calpinesolutions.com Point of Contact for RPS Filing – Phone: 619-684-8200 Did the Company have Ohio retail electric sales in 2018? 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). If this RPS report also addresses the compliance

If this RPS report also addresses the compliance N/A 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 <u>4901:1-40-05</u>) 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: 4,057,193

- 4. Source of reported sales volumes: General Ledger
- 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	7,303	7,303	GATS and M-RETS
Non-Solar	175,271	175,271	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 <u>4901:1-40-08</u>, 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))

Year	Baseline (MWHs)	Non-Solar Requirement	Solar Requirement
2019			
2020			
2021	Ţ		
2022			
2023			
2024			
2025			
2026			
2027			
2028			

A. Projected (non-binding) baseline for the current and future calendar years.

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.

Calpine Energy Solutions, LLC intends to purchase all required RECs, both solar and non-solar, from suppliers who have received a renewable energy facility certificate from the PUCO, have joined an approved REC registry, and will transfer RECs from the generator's account to the CRES account.

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

Calpine Energy Solutions, LLC does not expect any impediments with continued compliance.

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 <u>RPS webpage</u>, etc.

Calpine Energy Solutions, LLC has no comments at this time.

- -

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER RENEWABLE PORTFOLIO STANDARD (RPS) REPORT FOR CALENDAR YEAR 2018

I, Greg Bass, am the duly authorized representative of Calpine Energy Solutions, LLC. To the best of my knowledge all the information contained in the foregoing report including any exhibits and attachments are true, accurate and complete.

lass Signature

Any questions from the Commission Staff regarding this report should be directed to:

Bryan White ______ at Name

<u>619-684-8200</u> or Phone Number

bryan.white@calpinesolutions.com. E-Mail Address

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	Ó	0	(B)		
2017	0	0	0	(C)		
seline fo	r 2018 Compliance Obligation (MW)	ts)	4,057,193	(D) = AvgABC		
				Not Adjusted		
1.50%	2018 Statutory Compliance Oblig	ation				
	2018 Non-Solar Renewable Bencl		4.32%) (E)		
	2018 Solar Renewable Benchmark		0.18%	(F)		
	Per ORC, 4928.64(B)(2)					
	2018 Compliance Obligation			_		
	Non-Solar RECs Needed for Co	•	175,27			
	Solar RECs Needed for Complia	nce	7,30	03 (H) = (D) * (F)		
	Carry-Over from Previous Year(s)	, if applicable				
Non-Solar (RECs)			0 ()			
	Solar (S-RECs)		an an an an an an Araba. An an an an an an an Araba	0 (J)		
	Total 2018 Compliance Obligations					
Non-Solar RECs Needed for Compliance		175,27	$(K) = (G) + \{I\}$			
	Solar RECs Needed for Complia	nce	7,30	(L) = (H) + (J)		
	2018 Retirements (Per GATS and/	or MRETS Data)				
Non-Solar (RECs)			175,27	21. (M)		
	Solar (S-RECs)		7,30	33 (N)		
	Under Compliance in 2018, if appl	icable				
Non-Solar (RECs)			0 (O) = (K) - (M)			
	Solar (S-RECs)			O (P) = (L) - (N)		
	2018 Alternative Compliance Payr	nents				
	Non-Solar, per REC (Refer to Ca		\$51.3	1 (Q)		
	Solar, per S-REC See 4928.64(0	C)(2)(a)	\$250.0			
	2018 Payments, if applicable			_		
	Non-Solar Total		\$0.0	0 (S) = (O) * (Q)		
	Solar Total		\$0.0			
	TOTAL		\$0.0			

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. <u>However, you should still independently verify the accuracy of the calculations.</u> If the Company is proposing to pay an alternative compliance payment, please refer to OAC 4901:1-40-08 regarding the rounding af obligations. Questions concerning this worksheet can be addressed to Stuart.Siegfried@puco.ohio.gov