



An AEP Company

BOUNDLESS ENERGY™

Legal Department

American Electric Power
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Columbus, OH 43215-2373
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April 15, 2019

Tanowa Troupe
Docketing Division Chief
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Steven T. Nourse
Vice President - Legal
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Re: *In the Matter of the Annual Alternative Energy Status &
Compliance Report Under Rule 4901:1-40-05, Ohio Admin.
Code, for Ohio Power Company, Case No. 19-934-EL-ACP*

Dear Ms. Troupe:

Ohio Power Company (AEP Ohio) submits its 2018 Annual Compliance Plan Status Report under Rule 4901:1-40-05, Ohio Admin. Code. The enclosed document is the public version of the report. As indicated in the motion for protective order also being filed in this docket, the unredacted version of the report attachment is being filed under seal since it contains confidential information.

Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

Annual Compliance Plan Status Report

Introduction

In Case No. 08-888-EL-ORD, the Public Utilities Commission of Ohio (“Commission”) approved Rules for the Alternative Energy Portfolio Standard for electric utilities (“Rules”). The Rule became effective on December 10, 2009. Applying Amended Substitute Senate Bill 221 (“S.B. 221”), the Rules require that each electric utility within the jurisdiction of the Commission adhere to specific advanced and renewable energy benchmark percentages. Each electric utility and electric services company is required to file an annual status and compliance report. This report is to be filed by April fifteenth of each year. Per Ohio Administrative Code (“OAC”) 4901:1-40-05(A), the report shall include the following items:

- The annual review will include compliance with the most recent applicable renewable- and solar-energy resource benchmark.
- The annual compliance reviews shall consider any under-compliance an electric utility or electric services company asserts is outside its control.

Substitute Senate Bill 310 (“S.B. 310”) was enacted in 2014 and eliminated the requirement that 50 percent of the renewable energy resources used for compliance with S.B. 221 had to be sourced from renewable resources located within the state of Ohio. In addition, the 12.5 percent benchmark achieved through advanced and/or renewable energy resources by 2024 was eliminated.

Ohio Power Company (“AEP Ohio”) submits this Compliance Plan Status Report for Compliance Year 2018.

AEP Ohio has achieved compliance in meeting the 2018 Benchmarks for the Ohio Alternative Energy Portfolio Standard. AEP Ohio achieved the Benchmarks for both Non-Solar and Solar Renewables, as shown in the Summary Sheet.

Non-Solar Overview

Non-Solar achievement was met through two renewable energy purchase agreements with wind as the renewable energy resource and the AEP Ohio customer Renewable Energy Technology program. Additional details around the Non-Solar Benchmark are shown in the REC Details Sheet.

Solar Overview

Solar achievement was met through AEP Ohio facilities, the AEP Ohio customer Renewable Energy Technology program, and a renewable energy purchase agreement. Additional details around the Solar Benchmark are shown in the REC Details Sheet.

Adjustments

On April 15, 2019 AEP Ohio filed an application requesting a reduced baseline for economic growth with Case No. 19-814-EL-ACP. The application in Case No. 19-814-EL-ACP quantifies the adjustments for economic growth through the associated kWh captured in the Economic Development Rider, which consists of the Reasonable Arrangements with TimkenSteel, Eramet Marietta and Globe Metallurgical. AEP Ohio has applied these adjustments for economic growth for the 2018 Benchmarks, which are stated in the Summary Sheet.

In addition, under S.B. 310, all generation service providers have the option to establish their benchmarks based on the actual retail sales for the compliance year or through the average of the previous three years' actual sales. AEP Ohio has opted to use the actual retail sales since the 2015 compliance year and has done so for the 2018 compliance year and plans to continue to do so going forward.

Conclusion

AEP Ohio is compliant with the 2018 Non-Solar and Solar Benchmarks based on the actual RECs achieved in Non-Solar as well as the actual RECs achieved in Solar. As previously recommended in April 2012 by Staff regarding the procedure for retiring AEP Ohio's compliance year RECs, AEP Ohio's 2018 compliance year RECs have been transferred to AEP Ohio's GATS reserve subaccount.

**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	Internal Accounting Data	(A)
2016		0	0	Internal Accounting Data	(B)
2017		0	0	Internal Accounting Data	(C)

Baseline for 2018 Compliance Obligation (MWHs)

9,908,138

(D) = AvgABC

(Note: If using 2018 sales as your baseline, insert that figure in cell I14 and indicate in box to right if 2018 sales are adjusted or 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	428,032	(G) = (D) * (E)
	Solar RECs Needed for Compliance	17,835	(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	428,032	(K) = (G) + (I)
	Solar RECs Needed for Compliance	17,835	(L) = (H) + (J)
	2018 Performance (Per GATS or MRETS Data)		
	Non-Solar (RECs)	428,032	(M)
	Solar (S-RECs)	17,835	(N)
	Under Compliance in 2017, 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 15-0461-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@puc.state.oh.us*

AEP Ohio Compliance Plan Status Report for 2018
REC Details Sheet

1. NON-SOLAR Renewable Energy Credits

Month/Year	State	Facility Name	Certificate Serial Numbers	Quantity	OH State Number	Reserved
1/1/2018	OH					Yes
3/1/2018	OH					Yes
4/1/2018	OH					Yes
7/1/2018	OH					Yes
9/1/2018	OH					Yes
10/1/2018	OH					Yes
11/1/2018	OH					Yes
11/1/2015	IN					Yes
12/1/2015	IN					Yes
1/1/2016	IN					Yes
2/1/2016	IN					Yes
3/1/2016	IN					Yes
4/1/2016	IN					Yes
10/1/2015	IN					Yes
11/1/2015	IN					Yes
12/1/2015	IN					Yes
1/1/2016	IN					Yes
2/1/2016	IN					Yes
3/1/2016	IN					Yes
4/1/2016	IN					Yes
10/1/2015	OH					Yes
11/1/2015	OH					Yes
12/1/2015	OH					Yes
1/1/2016	OH					Yes
2/1/2016	OH					Yes
3/1/2016	OH					Yes
TOTAL	Ohio Non-Solar Renewable Energy Credits			428,032		

2. SOLAR Renewable Energy Credits

Month/Year	State	Facility Name	Certificate Serial Numbers	Quantity	OH State Number	Reserved
8/1/2017	OH					Yes
9/1/2017	OH					Yes
2/1/2018	OH					Yes
4/1/2018	OH					Yes
6/1/2018	OH					Yes
7/1/2018	OH					Yes
9/1/2018	OH					Yes
2/1/2018	OH					Yes
3/1/2018	OH					Yes

4/1/2018	OH				Yes
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7/1/2018	OH		Yes
8/1/2018	OH		Yes
9/1/2018	OH		Yes
10/1/2018	OH		Yes
11/1/2018	OH		Yes
12/1/2018	OH		Yes
2/1/2018	OH		Yes
3/1/2018	OH		Yes
4/1/2018	OH		Yes
5/1/2018	OH		Yes

6/1/2018	OH		Yes
7/1/2018	OH		Yes
8/1/2018	OH		Yes
9/1/2018	OH		Yes
10/1/2018	OH		Yes
12/1/2018	OH		Yes
4/1/2018	OH		Yes
7/1/2018	OH		Yes
3/1/2018	OH		Yes
5/1/2018	OH		Yes
6/1/2018	OH		Yes
7/1/2018	OH		Yes
9/1/2018	OH		Yes
11/1/2018	OH		Yes
3/1/2018	OH		Yes
5/1/2018	OH		Yes
6/1/2018	OH		Yes
8/1/2018	OH		Yes
9/1/2018	OH		Yes
4/1/2018	OH		Yes
7/1/2018	OH		Yes
1/1/2018	OH		Yes
2/1/2018	OH		Yes
3/1/2018	OH		Yes
4/1/2018	OH		Yes
5/1/2018	OH		Yes
6/1/2018	OH		Yes
7/1/2018	OH		Yes
8/1/2018	OH		Yes
9/1/2018	OH		Yes
10/1/2018	OH		Yes
11/1/2018	OH		Yes

12/1/2018	OH		Yes
4/1/2018	OH		Yes
7/1/2018	OH		Yes
12/1/2018	OH		Yes
1/1/2018	OH		Yes
3/1/2018	OH		Yes
4/1/2018	OH		Yes
5/1/2018	OH		Yes
6/1/2018	OH		Yes
7/1/2018	OH		Yes
8/1/2018	OH		Yes
9/1/2018	OH		Yes
10/1/2018	OH		Yes
5/1/2016	OH		Yes
6/1/2016	OH		Yes
7/1/2016	OH		Yes
8/1/2016	OH		Yes
9/1/2016	OH		Yes
10/1/2016	OH		Yes
11/1/2016	OH		Yes
12/1/2016	OH		Yes
1/1/2017	OH		Yes
2/1/2017	OH		Yes
3/1/2017	OH		Yes
4/1/2017	OH		Yes
5/1/2017	OH		Yes
6/1/2017	OH		Yes
TOTAL	Ohio Solar Renewable Energy Credits	17,835	

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Case No(s). 19-0934-EL-ACP

Summary: Return mail receipt - AEP Ohio submits its 2018 Annual Compliance Plan Status Report
electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company