

Ohio Adm.Code 4901:1-40-05(C), states:

Staff shall review each electric utility's or electric services company's alternative energy portfolio status report and any timely filed comments, and file its findings and recommendations and any proposed modifications thereto.

The findings and recommendations in this document pertain to the company's compliance status. This document does not address such matters as cost recovery or status relative to the statutory 3% cost provision.

II. Company Filing Summarized

Hudson Energy Services, LLC (HES or Company) filed its RPS compliance status report for the 2018 compliance year on April 12, 2019. In its compliance filing, HES proposed a baseline of 367,178 megawatt-hours (MWHs) which it indicated was an average of its Ohio retail electric sales for 2015, 2016, and 2017. Applying the statutory benchmarks to its proposed baseline, HES calculated its 2018 compliance obligations to be as follows:

- 661 Solar MWHs
- 15,862 Non-Solar¹ MWHs

The Company indicated that it had obtained the necessary renewable energy credits (RECs) and solar RECs (S-RECs) to satisfy its 2018 compliance obligations. The Company further indicated that it had transferred RECs and S-RECs to its PJM EIS Generation Attributes Tracking System (GATS) reserve subaccount for Ohio compliance purposes.

III. Filed Comments

No persons filed comments in this proceeding.

IV. Staff Findings

Following its review of the Company's annual status report, other relevant compliance materials, and any timely comments submitted in this proceeding, Staff makes the following findings:

¹ Staff uses "non-solar" in this context to refer to the total renewable requirement net of the specific solar carve-out. Staff acknowledges that there is not a specific "non-solar" requirement in the applicable statute.

- (1) HES was an electric services company in Ohio with retail electric sales in the state of Ohio during 2018, and therefore the Company had an RPS obligation for 2018.²
- (2) The baseline proposed by the Company is reasonable, and given the proposed baseline and the 2018 statutory benchmarks, HES accurately calculated its RPS compliance obligations.
- (3) The Company has transferred 661 S-RECs and 15,862 RECs to its GATS reserve subaccount for 2018 Ohio compliance purposes.
- (4) Following a review of the Company's reserve subaccount data on GATS, Staff confirmed that the Company satisfied its non-solar obligation for 2018. The RECs that the Company transferred to its GATS reserve subaccount were sourced from generating facilities certified by the Commission and were of appropriate vintages.
- (5) Following a review of the Company's reserve subaccount data on GATS, Staff confirmed that the Company satisfied its solar obligation for 2018. The S-RECs that the Company transferred to its GATS reserve subaccount were sourced from solar generating facilities certified by the Commission and were of appropriate vintages.

V. Staff Recommendations

Following its review of the information submitted in this proceeding and other relevant data, Staff recommends that HES be found to have satisfied its 2018 RPS compliance obligations.

² HES was certified to provide retail generation services in Ohio during 2018; see PUCO Case No. 12-1894-EL-CRS.

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Summary: Staff Review and Recommendation electronically filed by Mr. Stuart M Siegfried on behalf of PUCO Staff