

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Starion Energy	)	
PA, Inc. 2018 Renewable Portfolio	)	Case No. 19-0944-EL-ACP
Standard Status Report	)	

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**Staff Findings and Recommendations**

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**I. Statutory Background**

Amended Substitute Senate Bill 221, of the 127<sup>th</sup> General Assembly (2008 Ohio Laws S221, effective July 31, 2008), established Ohio's renewable portfolio standard (RPS) applicable to electric distribution utilities and electric service companies. The RPS is addressed principally in Ohio Revised Code (R.C.) 4928.64, with relevant resource definitions also contained within R.C. 4928.01(A).

According to R.C. 4928.64(B)(2), the compliance obligations for **2018** are as follows:

- Renewable Energy Resources = **4.32%** (includes solar requirement)
- Solar Energy Resources = **0.18%**

The Public Utilities Commission of Ohio (PUCO or Commission) further developed rules to implement the Ohio RPS, contained within Ohio Administrative Code (Ohio Adm.Code) 4901:1-40.

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

Unless otherwise ordered by the commission, each electric utility and electric services company shall file by April fifteenth of each year, on such forms as may be published by the commission, an annual alternative energy portfolio status report analyzing 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. Staff shall conduct annual compliance reviews with regard to the benchmarks under the alternative energy portfolio standard.

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**

Starion Energy PA, Inc. (Starion or Company) filed its RPS compliance status report for the 2018 compliance year on April 15, 2019. Starion proposed a baseline of 68,992 megawatt-hours (MWHs) which it indicated was an average of its annual Ohio retail electric sales for 2015, 2016 and 2017. Applying the statutory benchmarks to its proposed baseline, Starion calculated its 2018 compliance obligations to be as follows:

- 124 Solar MWHs
- 2,980 Non-Solar 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 the necessary RECs and S-RECs to its PJM EIS Generation Attributes Tracking System (GATS) and Midwest Renewable Energy Tracking System (M-RETS) reserve subaccount for Ohio compliance purposes.

## **III. Filed Comments**

No persons filed comments in this proceeding.

## **IV. Staff Findings**

Following its review of the annual status report and any timely comments submitted in this proceeding, Staff makes the following findings:

- (1) Starion is 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.<sup>1</sup>

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<sup>1</sup> Starion Energy PA, Inc. is certified to provide retail generation and power marketer services in Ohio; see PUCO Case No. 11-4250-EL-CRS

- (2) The baseline proposed by Starion is reasonable, and given the proposed baseline and the 2018 statutory benchmarks, Starion accurately calculated its RPS compliance obligations.
- (3) The Company has transferred 2,980 RECs and 6 S-RECs to its GATS reserve subaccount and 118 S-RECs to its M-RETS 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<sup>2</sup> 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 appropriately associated with electricity generated between August 1, 2008, and December 31, 2018.
- (5) Following a review of the Company's reserve subaccount data on GATS and M-RETS, Staff confirmed that the Company satisfied its solar obligation for 2018. The S-RECs that the Company transferred to its GATS and M-RETS reserve subaccounts were sourced from generating facilities certified by the Commission and were appropriately associated with electricity generated between August 1, 2008, and December 31, 2018.

## **V. Staff Recommendations**

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

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<sup>2</sup> 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.

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Summary: Staff Review and Recommendation electronically filed by Adam Bargar on behalf of PUCO Staff