

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Provision)	
Power & Gas, LLC 2017 Renewable)	Case No. 18-0424-EL-ACP
Portfolio Standard Status Report)	

In the Matter of the Provision)	
Power & Gas, LLC 2018 Renewable)	Case No. 19-0604-EL-ACP
Portfolio Standard Status Report)	

Staff Findings and Recommendations

I. Statutory Background

Amended Substitute Senate Bill 221, of the 127th 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 **2017** and **2018** are as follows:

Compliance Year	Total Renewable Requirement	Solar Requirement
2017	3.5%	0.15%
2018	4.5%	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 Filings Summarized

2017 Compliance Year

Provision Power & Gas, LLC (PP&G or Company) filed its RPS compliance status report for the 2017 compliance year on March 27, 2018. In its compliance filing, PP&G proposed a baseline of 5,610 megawatt-hours (MWHs) which it indicated was its Ohio retail electric sales for 2017. Applying the statutory benchmarks to its proposed baseline, PP&G calculated its 2017 compliance obligations to be as follows:

- 8 Solar MWHs
- 188 Non-Solar¹ MWHs

The Company indicated that it had obtained the necessary renewable energy credits (RECs) and solar RECs (S-RECs) to satisfy its 2017 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.

2018 Compliance Year

PP&G filed its RPS compliance status report for the 2018 compliance year on March 29, 2019. In its compliance filing, PP&G proposed a baseline of 41,122 MWHs which it indicated was its Ohio retail electric sales for 2018. Applying the statutory benchmarks to its proposed baseline, PP&G calculated its 2018 compliance obligations to be as follows:

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.

- 74 Solar MWHs
- 1,776 Non-Solar MWHs

The Company indicated that it had obtained the necessary RECs and S-RECs to satisfy its 2018 compliance obligations. The Company further indicated that it had transferred RECs and S-RECs to its GATS reserve subaccount for Ohio compliance purposes.

III. Filed Comments

No persons filed comments in these proceedings.

IV. Staff Findings

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

- (1) PP&G was an electric services company in Ohio with retail electric sales in the state of Ohio during 2017 and 2018, and therefore the Company had an RPS obligation for both 2017 and 2018.²
- (2) The baseline proposed by the Company for 2017 is reasonable, and given the proposed baseline and the applicable statutory benchmarks, PP&G accurately calculated its RPS compliance obligations for 2017.
- (3) The Company has transferred 8 S-RECs and 188 RECs to its GATS reserve subaccount for 2017 Ohio compliance purposes. Following a review of the GATS retirement data, Staff confirmed that the Company satisfied its RPS obligations for 2017. The S-RECs and RECs that the Company retired were sourced from generating facilities certified by the Commission and were of appropriate vintages.
- (4) The baseline proposed by the Company for 2018 is reasonable, and given the proposed baseline and the applicable statutory benchmarks, PP&G accurately calculated its RPS compliance obligations for 2018.
- (5) The Company has transferred 74 S-RECs and 1,776 RECs to its GATS reserve subaccount for 2018 Ohio compliance purposes. Following a review of the GATS

² PP&G was certified to provide power marketer services in Ohio during 2017 and 2018; see PUCO Case No. 16-1038-EL-CRS.

retirement data, Staff confirmed that the Company satisfied its RPS obligations for 2018. The S-RECs and RECs that the Company retired were sourced from generating facilities certified by the Commission and were of appropriate vintages.

V. Staff Recommendations

Following its review of the information submitted in these proceedings and other relevant data, Staff recommends that PP&G be found to have satisfied its 2017 and 2018 RPS compliance obligations.

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Case No(s). 18-0424-EL-ACP, 19-0604-EL-ACP

Summary: Staff Review and Recommendation for the 2017 and 2018 RPS Compliance Years
electronically filed by Mr. Stuart M Siegfried on behalf of PUCO Staff