

In the Matter of the Alternative Energy Case

Portfolio Status Report of Land O'Lakes, Inc.

I. Introduction

Land O'Lakes, Inc. ("LOL"), Competitive Retail Electric Service ("CRES") provider is an electric services company as defined in Section 4928.01(A)(9), Ohio Revised Code, and is subject to Rule 4901:1-40-05(A)(1), Ohio Administrative code ("OAC"), which requires electric service companies to submit an Annual Alternative Energy Portfolio Status Report detailing compliance with the advanced and renewable energy benchmarks specified in Section 4928.64(B), Revised Codes, and Rule 4901:1-40-03(A), OAC for the preceding calendar year. LOL hereby submits its alternative energy portfolio status for the calendar year 2019.

II. Determination of Retail Sales in Calendar Year 2019

During the calendar year 2019, the CRES states that it conducted retail sales of generation to its own facilities who utilized the generation in a load center located within the state of Ohio.

III. 2019 Benchmarks

Section 4928.64(B)(2), Ohio Revised Code, and Rule 4901:1-40-03(A), OAC, and Ohio Senate Bill 310 states that electric services companies for 2019 are required to supply 5.28% of the electricity delivered to their Ohio customers from non-solar renewable energy resources and 0.22% delivered from solar renewable energy resources.

IV. 2019 Baseline and Compliance Status

For compliance year 2019, the sales amount, 14,366 MWh, should be used as the baseline.

Renewable Type	Baseline (MWh)	Requirement	Benchmark (MWh)
Solar	14,366	0.22%	32
Non-Solar	14,366	5.28%	759

In accordance with Rule 4901:1-40-08(A), OAC, the renewable compliance payment applicable to LOL shall be rounded to the nearest MWh. As a result, the applicable 2019 MWh benchmarks in the table above have been rounded to a total of 32 MWh for solar and 759 MWh for non-solar. Pursuant to Section 4928.65, Ohio Revised Code, electric companies may meet their renewable energy benchmarks through the use of renewable energy credits ("RECs") and solar renewable energy credits ("SRECs").

V. Baseline for Future Calendar Years

LOL used an estimate of its annual electricity delivered to its facilities utilizing an average of the past 3 years of actual annual energy delivered to the LOL facilities by LOL.

VI. Ten Year Forecast

In accordance with Rule 4901:1-40-03(C), LOL hereby provides a projection for the next 10 years for RECs and SRECs. Projections are based on the changes made by Ohio Senate Bill 310, approved in May 2014, which froze Ohio's renewable energy and energy efficiency standards at 2014 levels for two years. The original schedule laid out in Senate Bill 221 resumed in 2017. This bill also eliminates Ohio in state energy requirements and allows utilities and CRES to fulfill Alternative Energy requirements with out of state resources.

Year	Non-Solar Renewable %	Solar Renewable %	Non-Solar Renewable (MWh)	Solar Renewable (MWh)
2020	6.24%	0.26%	887	37
2021	7.20%	0.30%	1,024	43
2022	8.16%	0.34%	1,160	48
2023	9.12%	0.38%	1,297	54
2024	10.08%	0.42%	1,433	60
2025	11.04%	0.46%	1,570	65
2026	12.00%	0.50%	1,707	71
2027	12.00%	0.50%	1,707	71
2028	12.00%	0.50%	1,707	71
2029	12.00%	0.50%	1,707	71

Supply Portfolio Projection, Including both generation Fleet and Power Purchase

LOL does not intend to construct or purchase any electric generation facilities. Therefore, LOL will continue to supply power to its facilities by purchasing power through the wholesale market.

VIII. Description of Methodology Used to Evaluate Compliance Options

LOL does not own or anticipate any electric generation facilities in its future. Thus, LOL's future renewable energy source compliance strategy is to purchase the required RECs and SRECs through market entities.


IX. Perceived Impediments to Achieving Compliance with Required Benchmarks

LOL does not foresee future impediments at the time of this filing.

X. Conclusion

LOL respectfully requests that the Commission find that LOL has complied with the applicable renewable energy resource benchmarks for 2019 and its associated reporting requirements.

I, Yone Dewberry, am a duly authorized representative and officer of Land O'Lakes, Inc. and state, to the best of my knowledge and ability, all the information contained in the foregoing Annual Alternative Energy Portfolio Status Report for Calendar Year 2019, including exhibits, are true, accurate and complete.

DocuSigned by:

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Yone Dewberry

SVP and Chief Supply Chain Officer

Land O'Lakes, Inc.

Staff's Template RPS Compliance Filing Report 2019 Compliance Year

Company Name:	LAND O'LAKES
Case Number (i.e., XX-XXXX-EL-ACP):	20-0715-EL-ACP
Point of Contact for RPS Filing – Name:	Justin Siemens
Point of Contact for RPS Filing – Email:	jsiemens@world-kinect.com
Point of Contact for RPS Filing – Phone:	502-907-3425

Did the Company have Ohio retail electric sales in 2019? YES ☒ NO ☐

If a CRES with sales in 2019, confirm the sales were conducted either as a power marketer or retail generation provider (i.e., took title to the electricity). YES ☒ NO ☐

If this RPS report also addresses the compliance obligation of an additional CRES Provider, list the company(-ies). Otherwise, indicate N/A. N/A

Note: If the Company indicated zero Ohio retail electric sales in 2019, it need not complete the remainder of this form.

Annual RPS Compliance Status Report (refer to Ohio Adm.Code [4901:1-40-05](#))

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 (2019) sales? ☐ (a) 3-year average ☒ (b) compliance year sales

2. 3 Year Average Calculation *(Note: years with zero sales should be excluded from calculation of average)*

Year	Annual Sales (MWHs)
2016	
2017	
2018	
Three Year Average	

3. Compliance year (2019) sales in MWHs: 14,366

4. Source of reported sales
volumes:

EDI PROVIDER

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 2019

	Required Quantity	Retired Quantity	Tracking System(s)
Solar	32	32	PJM GATS
Non-Solar	759	759	PJM 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 2019 compliance obligation, enter that amount here: \$_____ Pursuant to Ohio Adm.Code [4901:1-40-08](#), the obligation is rounded up to the next MWh in the event of a compliance payment.

- F. Is the Company seeking compliance relief related to its 2019 RPS compliance obligations under the 3% cost provision in ORC [4928.64\(C\)\(3\)](#)? Indicate Yes or No. ☐ Yes ☒ No

If "No" and a CRES Provider, proceed to Question G. If "Yes" and/or an EDU, indicate the Company's percent status using the calculation methodology detailed in Ohio Adm.Code [4901:1-40-07\(B\)](#). _____

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

No impediments were encountered.

- H. RPS Administration: Please describe any non-legislative suggestions the Company may have to make the administration of the Ohio RPS more effective and efficient. Additional communications, enhancements to the [RPS webpage](#), etc.

Compliance Plan Status Report for Compliance Year 2019
Summary Sheet

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data	
2016	0	0	0		(A)
2017	0	0	0		(B)
2018	0	0	0		(C)

Baseline for 2019 Compliance Obligation (MWHs)

14,366

(D) = AvgABC

(Note: If using 2019 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2019 sales are adjusted or not.

i.e., Not Adjusted

5.50% **2019 Statutory Compliance Obligation**
2019 Non-Solar Renewable Benchmark
2019 Solar Renewable Benchmark
Per ORC, 4928.64(B)(2)

5.28%

(E)

0.22%

(F)

2019 Compliance Obligation

Non-Solar RECs Needed for Compliance
Solar RECs Needed for Compliance

759

(G) = (D) * (E)

32

(H) = (D) * (F)

Carry-Over from Previous Year(s), if applicable

Non-Solar (RECs)
Solar (S-RECs)

0

(I)

0

(J)

Total 2019 Compliance Obligations

Non-Solar RECs Needed for Compliance
Solar RECs Needed for Compliance

759

(K) = (G) + (I)

32

(L) = (H) + (J)

2019 Retirements (Per GATS and/or MRETS Data)

Non-Solar (RECs)
Solar (S-RECs)

759

(M)

32

(N)

Under Compliance in 2019, if applicable

Non-Solar (RECs)
Solar (S-RECs)

0

(O) = (K) - (M)

0

(P) = (L) - (N)

2019 Alternative Compliance Payments

Non-Solar, per REC (Refer to Case 19-0742-EL-ACP)
Solar, per S-REC (Refer to ORC 4928.64(C)(2)(a))

\$52.62

(Q)

\$200.00

(R)

2019 Payments, if applicable (* See note below)

Non-Solar Total
Solar Total
TOTAL

\$0.00

(S) = (O) * (Q)

\$0.00

(T) = (P) * (R)

\$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 **2019** 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. If the Company is proposing to pay an alternative compliance payment, please refer to OAC 4901:1-40-08 regarding the rounding of obligations. Questions concerning this worksheet can be addressed to Stuart.Siegfried@puco.ohio.gov

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Case No(s). 20-0715-EL-ACP

Summary: Application 2019 RPS Compliance Report electronically filed by Mr. Justin Siemens on behalf of Land O'Lakes