



April 9, 2020

Ms. Barcy F. McNeal, Secretary
Public Utilities Commission of Ohio
180 East Broad Street
11th Floor
Columbus, OH 43215

Re: Discount Power, Inc. 2019 Ohio Alternative Energy Portfolio Standard Status Report - Case No. 20-0743-EL-ACP

Dear Ms. McNeal

Included in this filing is Discount Power, Inc.'s 2019 Ohio Alternative Energy Portfolio Standard Status Report. Please contact the undersigned with questions or concerns regarding this submission.

Thank you,

A handwritten signature in blue ink, appearing to read "Joel", followed by a long, horizontal, wavy line.

Joel Glassman
Chief Operating Officer
Discount Power, Inc.
Email: jglassman@discountpowerinc.com
Phone: (203) 225-3113



**Staff's Template RPS Compliance Filing Report
2019 Compliance Year**

Company Name: _____
Case Number (i.e., XX-XXXX-EL-ACP): _____
Point of Contact for RPS Filing – Name: _____
Point of Contact for RPS Filing – Email: _____
Point of Contact for RPS Filing – Phone: _____

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. _____

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: _____

4. Source of reported sales volumes: _____

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.

B. Compliance Obligation for 2019

	Required Quantity	Retired Quantity	Tracking System(s)
Solar			
Non-Solar			

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.

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.
- | | | |
|-----|-----|----|
| 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.

- 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)

5,598

(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

5.28%

(E)

2019 Solar Renewable Benchmark

0.22%

(F)

Per ORC, 4928.64(B)(2)

2019 Compliance Obligation

Non-Solar RECs Needed for Compliance

296

(G) = (D) * (E)

Solar RECs Needed for Compliance

12

(H) = (D) * (F)

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

Non-Solar (RECs)

0

(I)

Solar (S-RECs)

0

(J)

Total 2019 Compliance Obligations

Non-Solar RECs Needed for Compliance

296

(K) = (G) + (I)

Solar RECs Needed for Compliance

12

(L) = (H) + (J)

2019 Retirements (Per GATS and/or MRETS Data)

Non-Solar (RECs)

296

(M)

Solar (S-RECs)

12

(N)

Under Compliance in 2019, if applicable

Non-Solar (RECs)

0

(O) = (K) - (M)

Solar (S-RECs)

0

(P) = (L) - (N)

2019 Alternative Compliance Payments

Non-Solar, per REC (Refer to Case 19-0742-EL-ACP)

\$52.62

(Q)

Solar, per S-REC (Refer to ORC 4928.64(C)(2)(a))

\$200.00

(R)

2019 Payments, if applicable (* See note below)

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 **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*

Discount Power, Inc. - My RPS Compliance - OH - Jan 2019 - Dec 2019

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Delete	Total Generation for Subaccount	OH Solar	OH Renewable	Total Certificates Used for RPS
Discount Power, Inc.	Default	DEOK	5,870			308	12	296	308
Total			5,870	0		308	12	296	308

Discount Power, Inc. - Subaccount Details - OH - Jan 2019 - Dec 2019

Subaccount Name	Zone Name	Month/ Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar	OH Renewable
Default	DEOK	01/2015	NON45372	Ashland Solar 01 LLC - Ashland Solar 01 LLC	OH	SUN	1294035 - 1 to 1	1	11-SPV-OH-GATS-0301	Yes	
Default	DEOK	01/2015	NON40687	Robert Sarisky - M. T. Ruhl Electrical	PA	SUN	2852071 - 1 to 1	1	11-SPV-PA-GATS-0347	Yes	
Default	DEOK	12/2014	NON40687	Robert Sarisky - M. T. Ruhl Electrical	PA	SUN	2852017 - 1 to 1	1	11-SPV-PA-GATS-0347	Yes	
Default	DEOK	12/2014	NON43863	Reagan Res Solar - Reagan Res Solar	PA	SUN	2852018 - 1 to 1	1	11-SPV-PA-GATS-1041	Yes	
Default	DEOK	11/2014	NON48473	Lynn - Lynn	PA	SUN	1254865 - 1 to 1	1	11-SPV-PA-GATS-1183	Yes	
Default	DEOK	11/2014	NON45270	Cohen, Robert Residence - R Cohen	PA	SUN	1251990 - 1 to 1	1	11-SPV-PA-GATS-1769	Yes	
Default	DEOK	11/2014	NON66708	100 YEAR OLD HOUSE - 100 YEAR OLD HOUSE	OH	SUN	1344773 - 1 to 1	1	12-SPV-OH-GATS-1393	Yes	
Default	DEOK	07/2014	NON66708	100 YEAR OLD HOUSE - 100 YEAR OLD HOUSE	OH	SUN	1163108 - 1 to 1	1	12-SPV-OH-GATS-1393	Yes	
Default	DEOK	08/2014	NON66708	100 YEAR OLD HOUSE - 100 YEAR OLD HOUSE	OH	SUN	1165891 - 1 to 1	1	12-SPV-OH-GATS-1393	Yes	
Default	DEOK	09/2014	NON66708	100 YEAR OLD HOUSE - 100 YEAR OLD HOUSE	OH	SUN	1180632 - 1 to 1	1	12-SPV-OH-GATS-1393	Yes	
Default	DEOK	09/2014	NON75494	Christie, Luke Residence - L Christie	WV	SUN	2851932 - 1 to 1	1	13-SPV-WV-GATS-0644	Yes	
Default	DEOK	11/2014	NON75494	Christie, Luke Residence - L Christie	WV	SUN	2852003 - 1 to 1	1	13-SPV-WV-GATS-0644	Yes	
Default	DEOK	10/2017	NON34079	Heat Recovery Coke Facility - TG18	IN	WH	3610976 - 14775 to 15070	296	16-WER-IN-GATS-0188		Yes
Total								308			

Discount Power, Inc. - Subaccount Details - OH - Jan 2019 - Dec 2019

RPS	RPS Price	RPS Period	Deposit Date
Yes	\$5.65	2019	04/13/2020
Yes	\$4.00	2019	04/13/2020
Yes	\$4.00	2019	04/13/2020
Yes	\$4.00	2019	04/13/2020
Yes	\$4.00	2019	04/13/2020
Yes	\$4.00	2019	04/13/2020
Yes	\$5.65	2019	04/13/2020
Yes	\$5.65	2019	04/13/2020
Yes	\$5.65	2019	04/13/2020
Yes	\$5.65	2019	04/13/2020
Yes	\$4.00	2019	04/13/2020
Yes	\$4.00	2019	04/13/2020
Yes	\$7.50	2019	04/13/2020

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 20-0743-EL-ACP

Summary: Annual Report Discount Power, Inc. 2019 Ohio Alternative Energy Portfolio
Standard Status Report - Case No. 20-0743-EL-ACP electronically filed by Mr. Justin Kotwicki
on behalf of Discount Power, Inc.