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April 10, 2020

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

# Re: Palmco Power OH, LLC d/b/a Indra Energy 2019 Ohio Alternative Energy Portfolio Standard Status Report - Case No. 20-0746-EL-ACP

Dear Ms. McNeal

Included in this filing is Palmco Power OH, LLC d/b/a Indra Energy's 2019 Ohio Alternative Energy Portfolio Standard Status Report. Please contact the undersigned with questions or concerns regarding this submission.

Thank you,

Christina Costa

Christina Costa Regulatory Specialist Palmco Power OH, LLC dba Indra Energy Email: <u>Ccosta@indranergy.com</u> Phone: 718-975-9018



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

Point of C Point of C	nber (i.e., XX-XXXX-EL-ACP): Contact for RPS Filing – Name: Contact for RPS Filing – Email:		
Did the C	Company have Ohio retail electric sales in 2019?	YES	NO
either as a	5 with sales in 2019, confirm the sales were conducted a power marketer or retail generation provider (i.e., took e electricity).	YES	NO
obligation	PS report also addresses the compliance n of an additional CRES Provider, list the (-ies). Otherwise, indicate N/A.		
Note: If the remainder o	Company indicated zero Ohio retail electric sales in 2019, it nee f this form.	d not compl	lete the
Annual RF	'S Compliance Status Report (refer to Ohio Adm.Code 49	<u>901:1-40-05</u>	)
А.	<b>Baseline Determination</b>		
	1. SELECT ONE: To determine its compliance baseline, is the Company proposing to use (a)	(a) 3	-year average
	the 3-year average method or (b) compliance year (2019) sales?	(b) c	compliance year sale
	2 3 Year Average Calculation (Note: years with zer	o sales shoi	ild he excluded

ear 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

	<b>Required Quantity</b>	<b>Retired Quantity</b>	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 <u>4901:1-40-08</u>, 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<br/>obligations under the 3% cost provision in ORC 4928.64(C)(3)? Indicate Yes or<br/>No.No.YesNo

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 <u>4901:1-40-07(B)</u>.

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 <u>RPS webpage</u>, etc.

		Compliance Plan Status Repo Summai		-		
	Sales	Proposed		Sales	Source of	
	Unadjusted (MWHs)	Adjustments (MWHs)		Adjusted (MWHs)	Sales Volume Data	
2016	0	0		0		(A)
2017	0	0		0		(B)
2018	0	0		0		(C)
seline foi	r 2019 Compliance Obligation (MW	/Hs)		45,400	]	(D) = AvgABC
ote: If usi	ng 2019 sales as your baseline, inse	rt that figure in cell 114 and indi	cate ii	n cell K16 if 2019 sales are a	djusted or not.	i.e., Not Adjuste
5.50%	2019 Statutory Compliance Obl	igation				
	2019 Non-Solar Renewable Ben	chmark	Г	5.28%		(E)
	2019 Solar Renewable Benchma	rk		0.22%	7	(F)
	Per ORC, 4928.64(B)(2)				-	
	2019 Compliance Obligation					
	Non-Solar RECs Needed for C	ompliance	Г	2,39	)7	(G) = (D) * (E)
	Solar RECs Needed for Compl	•	-	10		(U) = (D) * (F)
			L	10		
	Carry-Over from Previous Year	s), if applicable	_		_	
	Non-Solar (RECs)				0	(I)
	Solar (S-RECs)				0	(1)
	Total 2019 Compliance Obligati	ons				
	Non-Solar RECs Needed for C	ompliance	Г	2,39	)7	(K) = (G) + (I)
	Solar RECs Needed for Comp	iance		10		(L) = (H) + (J)
	2019 Retirements (Per GATS an	d/or MRETS Data)	-		-	
	Non-Solar (RECs)			2,39		(M)
	Solar (S-RECs)			10	00	(N)
	Under Compliance in 2019, if a	oplicable				
	Non-Solar (RECs)		Г		0	(O) = (K) - (M)
	Solar (S-RECs)				0	(P) = (L) - (N)
	2019 Alternative Compliance Pa	•	Г	6-2 <i>(</i>		
	Non-Solar, per REC (Refer to		_	\$52.6		(Q)
	Solar, per S-REC (Refer to OR	C 4928.64(C)(2)(a))	L	\$200.0	00	(R)
	2019 Payments, if applicable (*	See note below)				
	Non-Solar Total		Г	\$0.0	00	(S) = (O) * (Q)
	Solar Total		F	\$0.0		(T) = (P) * (R)
	TOTAL			\$0.0	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. <u>However, you should still independently verify the</u> <u>accuracy of the calculations</u>. 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

## Palmco Power OH, LLC - 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
Palmco Power OH, LLC	Default	AEP Ohio	19,364			2,497	100	2,397	2,497
Palmco Power OH, LLC	Default	DAY	13,081			0	0	0	0
Palmco Power OH, LLC	Default	DEOK	5,025			0	0	0	0
Palmco Power OH, LLC	Default	FEOH	29,798			0	0	0	0
Total			67,268	0		2,497	100	2,397	2,497

							Certificate		State	
Subaccount Name	Zone Name	Month/ Year	Unit ID	Facility Name	State	Fuel Type	Serial Numbers	Quantity	Certification Number	OH Solar
Default	AEP Ohio	05/2015	NON41292	Stauffer - ground	PA	SUN	1453101 - 1 to 2	2	11-SPV-PA-GATS-0043	Yes
Default	AEP Ohio	07/2014	NON53730	DEY-Stefan-PA-PV-10.12KW Residence - DEY-Stefan- PA-PV-10.12KW Residence	PA	SUN	1431055 - 1 to 1	1	11-SPV-PA-GATS-2217	Yes
Default	AEP Ohio	08/2014	NON53730	DEY-Stefan-PA-PV-10.12KW Residence - DEY-Stefan- PA-PV-10.12KW Residence	PA	SUN	1431354 - 1 to 1	1	11-SPV-PA-GATS-2217	Yes
Default	AEP Ohio	09/2014	NON53730	DEY-Stefan-PA-PV-10.12KW Residence - DEY-Stefan- PA-PV-10.12KW Residence	PA	SUN	1431660 - 1 to 1	1	11-SPV-PA-GATS-2217	Yes
Default	AEP Ohio	10/2014	NON53730	DEY-Stefan-PA-PV-10.12KW Residence - DEY-Stefan- PA-PV-10.12KW Residence	PA	SUN	1432037 - 1 to 1	1	11-SPV-PA-GATS-2217	Yes
Default	AEP Ohio	12/2014	NON53730	DEY-Stefan-PA-PV-10.12KW Residence - DEY-Stefan- PA-PV-10.12KW Residence	PA	SUN	1432920 - 1 to 1	1	11-SPV-PA-GATS-2217	Yes
Default	AEP Ohio	01/2015	NON55068	Duane Ness - Duane Ness	PA	SUN	5886160 - 1 to 1	1	11-SPV-PA-GATS-3048	Yes
Default	AEP Ohio	03/2015	NON55068	Duane Ness - Duane Ness	PA	SUN	5886161 - 1 to 1	1	11-SPV-PA-GATS-3048	Yes
Default	AEP Ohio	04/2015	NON55068	Duane Ness - Duane Ness	PA	SUN	5886162 - 1 to 1	1	11-SPV-PA-GATS-3048	Yes
Default	AEP Ohio	01/2015	NON77153	Giant Eagle #4088 - Giant Eagle #4088	OH	SUN	6065044 - 1 to 5	5	12-SPV-OH-GATS-1047	Yes
Default	AEP Ohio	02/2015	NON77153	Giant Eagle #4088 - Giant Eagle #4088	OH	SUN	6065045 - 1 to 6	6	12-SPV-OH-GATS-1047	Yes
Default	AEP Ohio	05/2015	NON45752	SunLion Energy - DelgadoW	PA	SUN	1453497 - 1 to 1	1	12-SPV-PA-GATS-0002	Yes
Default	AEP Ohio	05/2015	NON63230	Sweigart-Earnest -PA-PV-27.5KW Residence - Sweigart -Earnest -PA-PV-27.5KW Residence	PA	SUN	1457169 - 1 to 2	2	12-SPV-PA-GATS-1020	Yes
Default	AEP Ohio	06/2014	NON64353	Marvin Henry - Marvin Henry	PA	SUN	1084861 - 1 to 5	5	12-SPV-PA-GATS-1216	Yes
Default	AEP Ohio	05/2015	NON59598	SunLion Energy - GingrichK	PA	SUN	1443318 - 1 to 7	7	12-SPV-PA-GATS-1441	Yes
Default	AEP Ohio	07/2014	NON73558	OBrien Energy - OBrien Energy	PA	SUN	1108237 - 1 to 1	1	13-SPV-PA-GATS-0633	Yes
Default	AEP Ohio	07/2014	NON95431	Fackler-Kim -PA-PV-9.81kW Residence - Fackler-Kim - PA-PV-9.81kW Residence	PA	SUN	1431133 - 1 to 1	1	14-SPV-PA-GATS-0164	Yes
Default	AEP Ohio	08/2014	NON95431	Fackler-Kim -PA-PV-9.81kW Residence - Fackler-Kim - PA-PV-9.81kW Residence	PA	SUN	1431398 - 1 to 1	1	14-SPV-PA-GATS-0164	Yes
Default	AEP Ohio	09/2014	NON95431	Fackler-Kim -PA-PV-9.81kW Residence - Fackler-Kim - PA-PV-9.81kW Residence	PA	SUN	1431707 - 1 to 1	1	14-SPV-PA-GATS-0164	Yes
Default	AEP Ohio	11/2014	NON95431	Fackler-Kim -PA-PV-9.81kW Residence - Fackler-Kim - PA-PV-9.81kW Residence	PA	SUN	1432613 - 1 to 1	1	14-SPV-PA-GATS-0164	Yes
Default	AEP Ohio	12/2014	NON84236	Lafayette Square Partners, LP-PA-PV-42kW Facility - Lafayette Square Partners, LP-PA-PV-42kW Facility	PA	SUN	1485181 - 1 to 3	3	14-SPV-PA-GATS-0357	Yes
Default	AEP Ohio	10/2014	NON84236	Lafayette Square Partners, LP-PA-PV-42kW Facility - Lafayette Square Partners, LP-PA-PV-42kW Facility	PA	SUN	1484735 - 1 to 5	5	14-SPV-PA-GATS-0357	Yes
Default	AEP Ohio	11/2014	NON84236	Lafayette Square Partners, LP-PA-PV-42kW Facility - Lafayette Square Partners, LP-PA-PV-42kW Facility	PA	SUN	1484961 - 1 to 4	4	14-SPV-PA-GATS-0357	Yes
Default	AEP Ohio	09/2014	NON84236	Lafayette Square Partners, LP-PA-PV-42kW Facility - Lafayette Square Partners, LP-PA-PV-42kW Facility	PA	SUN	1484491 - 1 to 5	5	14-SPV-PA-GATS-0357	Yes

OH Renewable	RPS	RPS Price	RPS Period	Deposit Date
	Yes	\$8.50	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$8.50	2019	04/13/2020
	Yes	\$8.50	2019	04/13/2020
	Yes	\$8.50		04/13/2020
	Yes	\$8.50	2019	04/13/2020
	Yes	\$8.50	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$15.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$15.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020

Subaccount Name	Zone Name	Month/ Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar
Default	AEP Ohio	08/2014	NON84236	Lafayette Square Partners, LP-PA-PV-42kW Facility - Lafayette Square Partners, LP-PA-PV-42kW Facility	PA	SUN	1484238 - 1 to 5	5	14-SPV-PA-GATS-0357	Yes
Default	AEP Ohio	07/2014	NON84236	Lafayette Square Partners, LP-PA-PV-42kW Facility - Lafayette Square Partners, LP-PA-PV-42kW Facility	PA	SUN	1484078 - 1 to 6	6	14-SPV-PA-GATS-0357	Yes
Default	AEP Ohio	06/2014	NON84236	Lafayette Square Partners, LP-PA-PV-42kW Facility - Lafayette Square Partners, LP-PA-PV-42kW Facility	PA	SUN	1483919 - 1 to 5	5	14-SPV-PA-GATS-0357	Yes
Default	AEP Ohio	05/2015	NON80770	Runkel PPA - Runkel PPA	PA	SUN	1491857 - 1 to 1	1	16-SPV-PA-GATS-0512	Yes
Default	AEP Ohio	04/2015	NON80770	Runkel PPA - Runkel PPA	PA	SUN	1488555 - 1 to 2	2	16-SPV-PA-GATS-0512	Yes
Default	AEP Ohio	03/2015	NON97441	Roda-Armond-PA-PV-4.935kW Residence - Roda- Armond-PA-PV-4.935kW Residence	PA	SUN	1487153 - 1 to 1	1	16-SPV-PA-GATS-0746	Yes
Default	AEP Ohio	02/2015	NON97441	Roda-Armond-PA-PV-4.935kW Residence - Roda- Armond-PA-PV-4.935kW Residence	PA	SUN	1486106 - 1 to 1	1	16-SPV-PA-GATS-0746	Yes
Default	AEP Ohio	01/2015	NON97441	Roda-Armond-PA-PV-4.935kW Residence - Roda- Armond-PA-PV-4.935kW Residence	PA	SUN	1485469 - 1 to 1	1	16-SPV-PA-GATS-0746	Yes
Default	AEP Ohio	05/2015	NON97441	Roda-Armond-PA-PV-4.935kW Residence - Roda- Armond-PA-PV-4.935kW Residence	PA	SUN	1491332 - 1 to 1	1	16-SPV-PA-GATS-0746	Yes
Default	AEP Ohio	01/2017	NON170258	Kokomo Solar - Kokomo Solar	IN	SUN	2701003 - 262 to 280	19	17-SPV-IN-GATS-0070	Yes
Default	AEP Ohio	05/2018	MSET89504101	AEP SUMMERSVILLE 1-2 H - 1	WV	WAT	4379737 - 30258 to 32049	1,792	09-HYD-WV-GATS-0082	
Default	AEP Ohio	10/2019	NON233515	North Lake Energy, LLC - 17	IN	WH	6567911 - 5508 to 6112	605	18-WER-IN-GATS-0472	
Total								2,497		

OH Renewable	RPS	RPS Price	RPS Period	Deposit Date
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
	Yes	\$18.00	2019	04/13/2020
Yes	Yes	\$7.50	2019	04/13/2020
Yes	Yes	\$7.50	2019	04/13/2020

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in

Case No(s). 20-0746-EL-ACP

Summary: Annual Report Palmco Power OH, LLC d/b/a Indra Energy 2019 Ohio Alternative Energy Portfolio Standard Status Report - Case No. 20-0746-EL-ACP electronically filed by Mr. Justin Kotwicki on behalf of Palmco Power OH, LLC