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April 24, 2020

Ms. Tanowa Troupe, Secretary
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, Ohio 43215

Re: Case No. 20-0549-EL-ACP

Dear Ms. Troupe:

On April 14, 2020, Duke Energy Ohio, Inc. (Duke Energy Ohio or Company) filed its annual report concerning its RPS Compliance Filing Report 2019 Compliance Year (Report). Subsequent to that filing, it was determined that the solar and non-solar numbers were switched in the report – both the solar numbers should be 8,851 and both the non-solar numbers should be 212,433. Filed concurrently with this letter is a revised Report with both the solar and non-solar numbers on the correct line.

The two attachments filed with the original Report Duke Energy Ohio filed on April 14, 2020 – the Additional Information and the Confidential Attachment - to the Report did not change and will stand as filed.

Respectfully submitted,

/s/Larisa M. Vaysman
Rocco O. D'Ascenzo (0077651)
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**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)			4,023,358		(D) = AvgABC
<i>(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>					i.e., Not Adjusted
5.50%	2019 Statutory Compliance Obligation				
	2019 Non-Solar Renewable Benchmark				(E)
	2019 Solar Renewable Benchmark				(F)
	Per ORC, 4928.64(B)(2)				
	2019 Compliance Obligation				
	Non-Solar RECs Needed for Compliance				(G) = (D) * (E)
	Solar RECs Needed for Compliance				(H) = (D) * (F)
	Carry-Over from Previous Year(s), if applicable				
	Non-Solar (RECs)				(I)
	Solar (S-RECs)				(J)
	Total 2019 Compliance Obligations				
	Non-Solar RECs Needed for Compliance				(K) = (G) + (I)
	Solar RECs Needed for Compliance				(L) = (H) + (J)
	2019 Retirements (Per GATS and/or MRETS Data)				
	Non-Solar (RECs)				(M)
	Solar (S-RECs)				(N)
	Under Compliance in 2019, if applicable				
	Non-Solar (RECs)				(O) = (K) - (M)
	Solar (S-RECs)				(P) = (L) - (N)
	2019 Alternative Compliance Payments				
	Non-Solar, per REC (Refer to Case 19-0742-EL-ACP)				(Q)
	Solar, per S-REC (Refer to ORC 4928.64(C)(2)(a))				(R)
	2019 Payments, if applicable (* See note below)				
	Non-Solar Total				(S) = (O) * (Q)
	Solar Total				(T) = (P) * (R)
	TOTAL				(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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Summary: Correspondence Duke Energy Ohio, Inc.'s AER Correspondence With Revised Report electronically filed by Mrs. Tammy M Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Vaysman, Larisa