

In the Matter of the Town Square)
Energy East, LLC 2019 Renewable Portfolio)
Standard Status Report)

Staff Findings and Recommendations

Ohio Adm.Code 4901:1-40-05(C), states:

Staff shall review each electric utility's or electric services company's renewable 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 Filing Summarized

Town Square Energy East, LLC (TSEE or Company) filed its RPS compliance status report for the 2019 compliance year on April 14, 2020. In its compliance filing, TSEE proposed a baseline of 6,863 megawatt-hours (MWHs) which it indicated was its Ohio retail electric sales for 2019. Applying the statutory benchmarks to its proposed baseline, TSEE calculated its 2019 compliance obligations to be as follows:

- 15 Solar MWHs
- 362 Non-Solar¹ MWHs

The Company indicated that it had obtained the necessary renewable energy credits (RECs) and solar RECs (S-RECs) to satisfy its 2019 compliance obligations.² The Company further indicated that it had transferred RECs and S-RECs to its PJM EIS Generation Attribute Tracking System (GATS) reserve subaccount for Ohio compliance purposes.

III. Filed Comments

No persons filed comments in this proceeding.

IV. Staff Findings

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

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.

² The Company's filing indicates that excess RECs were included, but Staff confirmed with the Company that this statement was an error. No excess was applied to this year's obligations.

- (1) TSEE was an electric services company in Ohio with retail electric sales in the state of Ohio during 2019, and therefore the Company had an RPS obligation for 2019.³
- (2) The baseline proposed by the Company is reasonable, and given the proposed baseline and the 2019 statutory benchmarks, TSEE accurately calculated its RPS compliance obligations.
- (3) The Company has transferred 15 S-RECs and 362 RECs to its GATS reserve subaccount for 2019 Ohio compliance purposes.
- (4) Following a review of the Company's reserve subaccount data on GATS, Staff confirmed that the Company satisfied its non-solar obligation for 2019. The RECs that the Company transferred to its GATS reserve subaccount were sourced from generating facilities certified by the Commission and were of appropriate vintages.
- (5) Following a review of the Company's reserve subaccount data on GATS, Staff confirmed that the Company satisfied its solar obligation for 2019. The S-RECs that the Company transferred to its GATS reserve subaccount were sourced from solar generating facilities certified by the Commission and were of appropriate vintages.

V. Staff Recommendations

Following its review of the information submitted in this proceeding and other relevant data, Staff recommends that TSEE is found to have satisfied its 2019 RPS compliance obligations. Staff further recommends that this annual compliance status report be automatically approved consistent with Ohio Adm.Code 4901:1-40-05(D).

³ TSEE was certified to provide retail generation and power marketer services in Ohio during 2019; see PUCO Case No. 12-3002-EL-CRS.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/17/2020 12:03:48 PM

in

Case No(s). 20-0801-EL-ACP

Summary: Staff Review and Recommendation electronically filed by Mr. Stuart M Siegfried on behalf of PUCO Staff