



March 26, 2021

Secretary, Public Utilities Commission of Ohio
180 E. Broad Street, 11th Floor
Columbus, Ohio 43215-3793

**RE: In the matter of the Annual Alternative Energy Resources
Compliance Report for Calendar Year 2020 and forward looking
compliance planning document for American PowerNet
Management, LP**

Case No. 21-0272-EL-ACP

Dear Sir/Madam:

Enclosed please find the Alternative Energy Resources Compliance Report (4901:1-40-05) for Calendar Year 2020 as well as the forward-looking compliance planning document (4901:1-40-03(C) for American PowerNet Management, LP.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Gregory G. Krajnik".

Gregory G. Krajnik
Vice President – Market Operations

Managing the Energy Evolution®

45 Commerce Drive, Wyomissing, PA 19610-1038 • (610) 372-8500 • Fax (610) 372-9100

www.americanpowernet.com

Competitive Retail Electric Service Provider Alternative Energy Resource
Compliance Report for Calendar Year 2020

American PowerNet Management, LP

American PowerNet Management, LP (hereunder, "CERS") in accordance with Commission Rules 4901:1-40-03(C) and 4901:1-40-05 hereby submits this Annual Alternative Energy Report ("AER") detaining compliance with the Ohio Alternative Energy Portfolio Standards.

I. Determination that an Alternative Energy Resource Report is required.

During the calendar year 2020, the CRES states that it conducted retail sales of generation to customers who utilized the generation in a load center located in the state of Ohio.

II. Determination of the sales baseline for 2020:

- a) During the past three calendar years, the CRES made retail sales of generation in the amounts below:

2017	_____	n/a	_____	MWh
2018	_____	n/a	_____	MWh
2019	_____	n/a	_____	MWh

- b) The CRES made no sales in calendar year 2016, 2017 and 2018. The CRES states that the estimated average baseline to be used for the calendar year 2019 is:

_____205,052_____ MWh

III. Determination of the number of Solar and Non-Solar Renewable Energy Credits (RECs) required and statement of the number of RECs claimed:

Types	No of RECs required (a)	No of RECs obtained (b)	Registry (c)
Solar	0	0	PJM GATS

Non-Solar	11,278	11,285	PJM GATS
Total	11,278	11,285	PJM GATS

- a) Column (a) above represents the unadjusted number of solar and Total RECs required for the CRES in 2020. The determinations were calculated by multiplying the baseline sales by 0.0% for Solar RECs and 5.5% for Non-Solar RECs. Total RECs include both Solar and Non-Solar RECs.
- b) The CRES states that it has obtained the number of both Solar and Non-Solar RECs listed in column (b) above for 2020.
- c) The CRES used the PJM GATS registry for the RECs detailed above.

IV. Compliance

The CRES states that it has obtained the required number of Solar and Non-Solar RECs without adjustments permitted pursuant to rule 4901:1-40-05 (A)(3).

V. Ten Year Forecast

- a) In accordance with Rule 4901:1-40-03 (c), the CRES hereby provides a projection for the next ten years of Non-Solar RECs and Solar RECs.

Year	Solar RECs	Non-Solar RECs	Total RECs
2021	0	12000	12000
2022	0	13000	13000
2023	0	14000	14000
2024	0	15000	15000
2025	0	16000	16000
2026	0	17000	17000
2027	0	17000	17000
2028	0	17000	17000
2029	0	17000	17000
2030	0	17000	17000

- b) Supply portfolio projection

The CRES does not own a generation asset that can be utilized for Ohio compliance and does not usually carry forward for longer than 3 years a Total REC position in a supply portfolio and generally purchases Total RECs on an as needed basis.

c) Methodology used to evaluate Compliance

The CRES generally utilizes REC broker markets for spot market procurement options and does not see any future impediments. The CRES will continue to use REC broker markets to evaluate compliance options.



Public Utilities Commission

Staff's Template RPS Compliance Filing Report 2020 Compliance Year

Company Name: American PowerNet Management, LP
Case Number (i.e., XX-XXXX-EL-ACP): 21-0272-EL-ACP
Point of Contact for RPS Filing – Name: Gregory G. Krajnik
Point of Contact for RPS Filing – Email: gkrajnik@americanpowernet.com
Point of Contact for RPS Filing – Phone: 610-372-8500

Did the Company have Ohio retail electric sales in 2020? YES ☒ NO ☐

If a CRES with sales in 2020, 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 2020, 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 (2020) 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)
2017	
2018	
2019	
Three Year Average	

3. Compliance year (2020) sales in MWHs: 205,052

4. Source of reported sales
volumes:

PJM EIS - GATS

5. Does the Company's proposed baseline incorporate reductions to its annual sales volume(s) as a result of serving registered self-assessing purchasers? (Refer to [ORC 4928.644](#))

☐ YES

☒ NO

B. Compliance Obligation for 2020

	Required Quantity	Retired Quantity	Tracking System(s)
Renewable	11,278	11,285	PJM EIS - GATS

Note: multiply the proposed baseline by the statutory benchmark 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 2020 compliance obligation, enter that amount here: \$ 0.00
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 2020 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\(B\)](#). 0.00%

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

The CRES generally utilizes REC broker markets for spot market procurement options and does not see any future impediments. The CRES will continue to use REC broker markets to evaluate compliance options.

- 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.

N/A

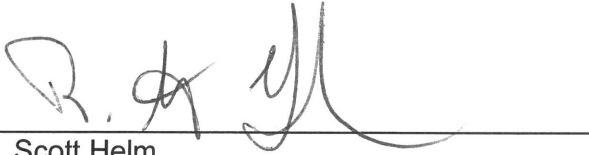
**Compliance Plan Status Report for Compliance Year 2020
Summary Sheet**

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data	
2017	0	0	0		(A)
2018	0	0	0		(B)
2019	0	0	0		(C)
Baseline for 2020 Compliance Obligation (MWHs)			205,052		(D) = AvgABC
<i>(Note: If using 2020 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2020 sales are adjusted or not.</i>					i.e., Not Adjusted
5.50%	2020 Statutory Compliance Obligation				
	2020 Total Renewable Benchmark		5.50%		(E)
	<u>Per ORC 4928.64(B)(2)</u>				
	2020 Compliance Obligation				
	RECs/S-RECs Needed for Compliance		11,278		(F) = (D) * (E)
	Carry-Over from Previous Year(s), if applicable				
	RECs/S-RECs (Prior Excess) or Prior Deficiency		0		(G)
	Total 2020 Compliance Obligations				
	RECs/S-RECs Needed for Compliance		11,278		(H) = (F) + (G)
	2020 Retirements (Per GATS and/or MRETS Data)				
	RECs/S-RECs		11,285		(I)
	Under Compliance in 2020, if applicable				
	RECs/S-RECs		-7		(J) = (H) - (I)
	2020 Alternative Compliance Payments				
	Per REC (Case 20-0163-EL-ACP)		\$53.49		(K)
	2020 Payments, if applicable (* See note below)				
	Total		-\$374.43		(L) = (J) * (K)

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 2020 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

**Competitive Retail Electric Service Provider Alternative Energy Resource
Compliance Report for Calendar Year 2020 of American PowerNet Management, LP**

I, R. Scott Helm am the duly authorized representative of American PowerNet Management, LP and state to the best of my knowledge and ability, all the information contained in the foregoing Competitive Retail Electric Service Provider Alternative Energy Resource Compliance Report for Calendar Year 2020, including any exhibits and attachments are true, accurate and complete.

A handwritten signature in black ink, appearing to read 'R. Scott Helm', is written over a horizontal line.

R. Scott Helm
President
American PowerNet Management, LP

American PowerNet Management, L.P. – My RPS Compliance – OH – Jan 2020 – Dec 2020

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Delete	Total Generation for Subaccount	OH Solar	OH Renewable	Total Certificates Used for RPS
American PowerNet Management, L.P.	Default	DEOK	144,108			7,905	0	7,905	7,905
American PowerNet Management, L.P.	Default	FEOH	60,944			3,380	0	3,380	3,380
Total			205,052	0		11,285	0	11,285	11,285

American PowerNet Management, L.P. – Subaccount Details – OH – Jan 2020 – Dec 2020

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar	OH Renewable	RPS	RPS Price	RPS Period	Deposit Date
Default	DEOK	7/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	7868485 - 1 to 1166	1,166	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	DEOK	9/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	8340124 - 1 to 1100	1,100	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	DEOK	8/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	8340123 - 1 to 1141	1,141	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	DEOK	5/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	7868483 - 1 to 938	938	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	DEOK	10/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	8408313 - 1 to 1177	1,177	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	DEOK	6/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	7868484 - 1 to 1123	1,123	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	DEOK	4/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	7303632 - 3 to 1141	1,139	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	DEOK	7/1/2020	NON237013	Big Turtle Wind Farm, LLC - Big Turtle Wind Farm Two	MI	WND	8407056 - 1001 to 1121	121	18-WND-MI-GATS-0511		Yes	Yes	\$10.45	2020	3/25/2021
Default	FEOH	1/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	7303629 - 1 to 1140	1,140	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	FEOH	2/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	7303630 - 1 to 1067	1,067	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	FEOH	3/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	7303631 - 1 to 1171	1,171	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Default	FEOH	4/1/2020	NON85239	Zeeland Renewable Energy CO-Generating Station - Plant 1	MI	LFG	7303632 - 1 to 2	2	14-BIO-MI-GATS-0208		Yes	Yes	\$10.45	2020	3/25/2021
Total								11,285							

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

3/29/2021 5:01:15 PM

in

Case No(s). 21-0272-EL-ACP, 21-0273-EL-ACP

Summary: Annual Report In the matter of the Annual Alternative Energy Resources Compliance Report for Calendar Year 2020 and forward looking compliance planning document for American PowerNet Management, LP electronically filed by Mr. Gregory G Krajnik on behalf of American PowerNet Management, LP and APN Starfirst, LP