



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 APN Starfirst, LP**

Case No. 21-0273-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 APN Starfirst, LP.

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

Sincerely,

Gregory G. Krajnik
Vice President – Market Operations

Managing the Energy Evolution®

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

APN Starfirst, LP

APN Starfirst, 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	_____	166,162	_____	MWh
2018	_____	172,311	_____	MWh
2019	_____	168,203	_____	MWh

- b) The CRES made sales in calendar year 2017, 2018 and 2019. The CRES states that the average baseline to be used for the calendar year 2020 is:

_____ 168,892 _____ 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	9,289	9,300	PJM GATS
Total	9,289	9,300	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	10200	10200
2022	0	11050	11050
2023	0	11900	11900
2024	0	12750	12750
2025	0	13600	13600
2026	0	14450	14450
2027	0	14450	14450
2028	0	14450	14450
2029	0	14450	14450
2030	0	14450	14450

- 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: APN Starfirst
Case Number (i.e., XX-XXXX-EL-ACP): 21-0273-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	166,162
2018	172,311
2019	168,203
Three Year Average	168,892

3. Compliance year (2020) sales in MWHs: 153,494

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	9289	9300	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	166,162	(A)
2018	0	0	172,311	(B)
2019	0	0	168,203	(C)

Baseline for 2020 Compliance Obligation (MWHs)

168,892

(D) = AvgABC

(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.e., Not Adjusted

5.50%

2020 Statutory Compliance Obligation

2020 Total Renewable Benchmark

Per ORC 4928.64(B)(2)

5.50%

(E)

2020 Compliance Obligation

RECs/S-RECs Needed for Compliance

9,289

(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

9,289

(H) = (F) + (G)

2020 Retirements (Per GATS and/or MRETS Data)

RECs/S-RECs

9,300

(I)

Under Compliance in 2020, if applicable

RECs/S-RECs

-11

(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

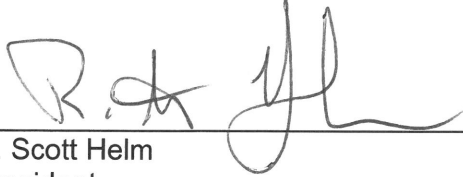
-\$588.39

(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 APN Starfirst**

I, R. Scott Helm am the duly authorized representative of APN Starfirst 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 dark ink, appearing to read 'R. Scott Helm', is written over a horizontal line.

R. Scott Helm
President

American PowerNet Management, LP

APN Starfirst, 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
APN Starfirst, LP (MetEd)	Default	AEP Ohio	54,411			3,300	0	3,300	3,300
APN Starfirst, LP (MetEd)	OH/ATSI	FEOH	99,083			6,000	0	6,000	6,000
Total			153,494	0		9,300	0	9,300	9,300

APN Starfirst, 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	AEP Ohio	8/1/2020	NON237013	Big Turtle Wind Farm, LLC - Big Turtle Wind Farm Two	MI	WND	8407057 - 1 to 3300	3,300	18-WND-MI-GATS-0511	Yes	Yes	Yes	\$10.45	2020	3/26/2021
OH/ATSI	FECH	7/1/2020	NON237013	Big Turtle Wind Farm, LLC - Big Turtle Wind Farm Two	MI	WND	8407056 - 1337 to 3185	1,849	18-WND-MI-GATS-0511	Yes	Yes	Yes	\$10.45	2020	3/26/2021
OH/ATSI	FECH	8/1/2020	NON237013	Big Turtle Wind Farm, LLC - Big Turtle Wind Farm Two	MI	WND	8407057 - 3301 to 4779	1,479	18-WND-MI-GATS-0511	Yes	Yes	Yes	\$10.45	2020	3/26/2021
OH/ATSI	FECH	9/1/2020	NON237013	Big Turtle Wind Farm, LLC - Big Turtle Wind Farm Two	MI	WND	8407058 - 1 to 2672	2,672	18-WND-MI-GATS-0511	Yes	Yes	Yes	\$10.45	2020	3/26/2021
Total								9,300							

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

Case No(s). 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 APN Starfirst, LP electronically filed by Mr. Gregory G Krajnik on behalf of APN Starfirst, LP