



Staff's Template RPS Compliance Filing Report
2020 Compliance Year

Company Name: Cleveland-Cliffs Steel LLC
Case Number (i.e., XX-XXXX-EL-ACP): 21-0340-EL-ACP
Point of Contact for RPS Filing – Name: Wayne Harman
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Point of Contact for RPS Filing – Phone: 219-399-4273

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	671,289
2018	666,095
2019	620,364
Three Year Average	652,582

3. Compliance year (2020) sales in MWHs: 15,160

4. Source of reported sales
volumes:

PJM Billing

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	834	834	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.

2019 retirements included an excess of 3,441 RECs beyond what we were required to retire for that CY. 834 of those excess retired RECS are being used to meet our obligation of 834 for CY2020 leaving an excess of 2,607 retired RECs.

We have reduced our sales by 456,391 MWhs due to claiming the self assessment exclusion provided for in HB 6 for our Cleveland, Ohio site.

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: \$_____ 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.

None.

- 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.

None.

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Case No(s). 21-0340-EL-ACP

Summary: Annual Report 2020 RPS Compliance Report for Cleveland-Cliffs Steel LLC
electronically filed by Mr. Wayne J Harman on behalf of Cleveland-Cliffs Steel LLC