



3050 Post Oak Blvd  
Suite 1330  
Houston, TX 77056

Phone: 800-982-1670  
Fax: 713-583-9087

Via E-Filing

April 15, 2021

Public Utilities Commission of Ohio  
180 East Broad Street  
11<sup>th</sup> Floor - PUCO Docketing Division  
Columbus, Ohio 43215  
(614) 466-4095

RE: **Case Number: 21-0467-EL-ACP Annual RPS Compliance & Plan Status Summary**  
Freepoint Energy Solutions LLC – 16-1130E approved 10/20/2016

Dear PUCO Docketing Division :

As required by Ohio Administrative Codes 4901:1-40-05 and 4901:1-40-03 (C), Freepoint Energy Solutions LLC ("Freepoint") hereby submits its annual RPS Compliance Report for compliance year 2020. The enclosed report is filed under Case Number 21-0467-EL-ACP:

- Annual RPS Compliance Filing Report
- Compliance Plan Status Report for Compliance Year 2020 Summary Sheet

If you have any questions regarding the filing of this report, please feel free to contact me.

Respectfully submitted,

A handwritten signature in blue ink that reads "Lena Davila".

Lena Davila  
Compliance Analyst  
(713) 239-8074  
[LDavila@freepointsolutions.com](mailto:LDavila@freepointsolutions.com)



Staff's Template RPS Compliance Filing Report  
2020 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 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. \_\_\_\_\_

*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: \_\_\_\_\_

4. Source of reported sales volumes: \_\_\_\_\_

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			

*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.

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.
- |     |     |    |
|-----|-----|----|
| 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 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)

1,572,255

(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

5.50%

(E)

[Per ORC 4928.64\(B\)\(2\)](#)

**2020 Compliance Obligation**

RECs/S-RECs Needed for Compliance

86,474

(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

86,474

(H) = (F) + (G)

**2020 Retirements (Per GATS and/or MRETS Data)**

RECs/S-RECs

86,474

(I)

**Under Compliance in 2020, if applicable**

RECs/S-RECs

0

(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

\$0.00

(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](mailto:Stuart.Siegfried@puco.ohio.gov)

**This foregoing document was electronically filed with the Public Utilities**

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**Case No(s). 21-0467-EL-ACP**

Summary: Annual Report Freepoint Energy Solutions LLC - Annual RPS Compliance & Plan  
Status Summary electronically filed by Ms. Lena Davila on behalf of Freepoint Energy  
Solutions LLC