# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of DPL Energy Resources, Inc.	)	Case No. 11-2386-EL-ACP
Ten Year Advanced Energy and Renewable	)	
Energy Benchmark Compliance Plan	)	
	)	

# DPL ENERGY RESOURCES, INC. TEN YEAR ADVANCED ENERGY AND RENEWABLE ENERGY BENCHMARK COMPLIANCE PLAN

Pursuant to Section 4901:1-40-03(C) of the Ohio Administrative Code, DPL Energy Resources, Inc. hereby submits the attached ten year advanced energy and renewable energy benchmark compliance plan.

Respectfully submitted,

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**DPL Energy Resources, Inc.** 

# Advanced Energy and Renewable Energy Benchmark 10 Year Compliance Plan

Dated: April 15, 2011

Pursuant to Ohio Administrative Code (OAC) Section 4901:1-40-03(C), DPL Energy Resources, Inc. (DPLER) hereby submits its ten year advanced energy and renewable energy benchmark compliance plan. DPLER is an electric services company as defined by Ohio Revised Code (ORC) Section 4928.01(A)(9) and is therefore subject to the advanced energy and renewable benchmarks contained in ORC §4928.64. The purpose of this plan is to provide the Public Utilities Commission of Ohio (PUCO or Commission), as well as all interested parties, an understanding as to how DPLER plans to achieve those benchmarks.

#### Baseline

ORC §4928.64(B) and OAC §4901:1-40-03(B) specify that an electric services company's advanced energy and renewable energy benchmarks must be based on the previous three years kilowatt-hours of electricity sold to any and all retail electric consumers in the state. Sales used for the baseline should be based on the kilowatt-hour sales in the electric services company's most recent quarterly market-monitoring reports. For the purposes of this report DPLER forecasted its sales within Ohio for the next 10 years.

The chart below shows DPLER's renewable energy and solar benchmarks, within and outside of Ohio, for the next ten years consistent with the Commission's rules.

	DPLER's Forecasted 10 Year Retail Sales and Re	enewable Requirements
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	DPLER's Annual Baseline SB 221 Requirement*	SB 221 Compliance Requirement %		Renewable Requirement		Solär Requirement	
Year	MWh	Renewable Energy Resource	Solar Energy Resource	Total MWh	50% from Ohio MWh	Total MWh	50% from Ohlo MWh
2010	2,695,043	0.50%	0.01%	13,206	6,603	270	135
2011	2,995,684	1.00%	0.03%	29,058	14,529	899	449
2012	3,901,910	1.50%	0.06%	56,188	28,094	2,341	1,171
2013	5,327,917	2.00%	0.09%	101,763	50,882	4,795	2,398
2014	5,823,095	2.50%	0.12%	138,590	69,295	6,988	3,494
2015	5,797,973	3.50%	0.15%	194,232	97,116	8,697	4,348
2016	5,845,288	4.50%	0.18%	252,516	126,258	10,522	5,261
2017	5,886,216	5.50%	0.22%	310,792	155,396	12,950	6,475
2018	5,917,669	6.50%	0.26%	369,263	184,631	15,386	7,693
2019	5,950,363	7.50%	0.30%	428,426	214,213	17,851	8,926
2020	5,982,774	8.50%	0.34%	488,194	244,097	20,341	10,171
2021	6,018,066	9.50%	0.38%	548,848	274,424	22,869	11,434

#### **Assumptions**

## **Compliance Plan**

DPLER's utility affiliate, The Dayton Power and Light Company (DP&L), filed its initial renewable compliance plan in its Electric Security Plan (ESP) (Case No. 08-1094-EL-SSO) in October 2008. That plan stated that the Company as a whole planned to procure renewable resources and/or Renewable Energy Credits (RECs) on behalf of both the utility and DPLER. That plan was approved by Commission order dated June 24, 2009.

On a going forward basis, it is expected that DP&L will continue to procure renewable resources and/or RECs on behalf of both the utility and DPLER. Thus, this compliance plan is largely dependent on the success of DP&L's plan to meet the renewable and solar requirements set out in Senate Bill 221 (SB 221) for both the utility and DPLER. Through DP&L's efforts,

<sup>\*</sup> Baseline SB 221 Requirements are based on average MWh sales made in the state from the preceding three calendar years, based on market monitoring reports. Targets beyond 2010 are forecasted and are subject to change.

DPLER plans to obtain RECs in the near-term combined with potential new renewable generation and additional REC purchases in the mid- to longer-term planning horizon.

#### Ohio Non-Solar Renewable Benchmarks

In the short- and long-term, DPLER continues to expect to meet the Ohio Non-Solar Benchmarks through an allocated share of RECs purchased by DP&L.

#### Non-Ohio Non-Solar Renewable Benchmarks

DPLER continues to expect to meet the Non-Ohio Non-Solar Benchmarks through an allocated share of RECs purchased by DP&L. In the longer-term, compliance will be through a combination of REC purchases and, where feasible, deliverable and economically beneficial, through the purchase of electricity and associated RECs from renewable facilities located out of State.

#### **Ohio Solar Renewable Benchmarks**

As provided in DPLER's December 30, 2009 Application to amend the Ohio Solar Benchmarks (Case No. 09-2006-EL-ACP) there were insufficient solar resources in Ohio for DPLER to meet the 2009 Ohio Solar benchmark. Through this filing DPLER sought PUCO approval to modify its 2009 Ohio Solar benchmark. This filing was approved by Commission order dated March 23, 2011.

DPLER plans to meet its Ohio Solar Benchmarks through an allocated share of RECs purchased by DP&L where economically available. DPLER may incrementally build solar generation facilities in coordination with its customers. On March 15, 2010 DPLER announced its commitment to build a 60 kW solar array at the Mound Advanced Technology Center in Miamisburg, Ohio. The project was complete and operational on June 29, 2010. The facility operates at about a 14% capacity factor and therefore will produce approximately 73,000 kwh per year. The Mound Solar Generation Facility was issued its Ohio renewable energy certificate on January 28, 2011.

#### Non-Ohio Solar Renewable Benchmarks

PUCO Certified Non-Ohio Solar RECs are available only on a limited basis in the market. DPLER, through DP&L, will continue to monitor the availability and pricing of Ohio

certified Non-Ohio Solar RECs and may build incremental solar facilities as necessary if RECs are not readily available.

## **Advanced Energy Benchmark**

The advanced energy benchmark as outlined in ORC §4928.64 requires that by 2025, 12.5% of DPLER's sources of electricity supply may be generated from advanced energy resources such as modifications of existing generating facilities that increase the generation output of the facility, distributed generation systems, clean coal technology, advanced nuclear, fuel cell, or advanced solid waste that results in measurable greenhouse gas emission reductions. Since DPLER does not own significant generation resources of its own, it will likely purchase generation resources from producers that employ advanced energy technologies. However, DPLER will continue to monitor technological advances and make changes to its plan to comply with this portion of the SB 221 benchmarks as appropriate.

### Conclusion

DPLER intends to meet the Renewable and Advanced Energy Benchmarks in the most cost-effective way possible. DP&L has committed to meet DPLER's Renewable and Solar Benchmarks for the near term.

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

4/15/2011 3:55:27 PM

in

Case No(s). 11-2386-EL-ACP

Summary: Annual Report In the Matter of DPL Energy Resources Inc`s ten year advanced energy and renewable energy benchmark compliance plan electronically filed by Eric R Brown on behalf of DPL Energy Resources Inc.