



**CUSTOMIZED
ENERGY SOLUTIONS**

April 15, 2013

Ms. Barcy F. McNeal, Secretary
Public Utilities Commission of Ohio
180 E. Broad Street, 11th Floor
Columbus, OH 43215

Re: Palmco Power OH, LLC 2012 Alternative Energy Portfolio Status Report

Dear Ms. McNeal,

Included in this filing is a redacted version Palmco Power OH, LLC's 2012 Alternative Energy Portfolio Status Report. In accordance with Rule 4901-1-24(D) of the Ohio Administrative Code, a motion for protective order has been filed and three copies of the confidential version of the report have been submitted under seal to the Commission. Please contact the undersigned with questions or concerns regarding this submission.

Thank you,

Erika Schmitt
Customized Energy Solutions, Ltd.
Email: eschmitt@ces-ltd.com
Phone: 267-331-4242

On behalf of Palmco Power OH, LLC

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Alternative Energy)
Portfolio Status Report for Calendar Year 2012)
of Palmco Power OH, LLC)

Case No. 13-0930-EL-ACP

**PALMCO POWER OH, LLC'S
ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT**

I. Introduction

Palmco Power OH, LLC ("Palmco") is an electric services company as defined within Section 4928.01(A)(9), Revised Code. In accordance with Commission Rules 4901:1-40-03 and 4901:1-40-05 Palmco hereby submits its alternative portfolio status report detailing compliance with the Ohio Alternative Energy Portfolio Standards.

II. Baseline Calculation

- a. Palmco did not make and retail sales during the three preceding calendar years as shown below:

2009 _____ 0 _____ MWh
2010 _____ 0 _____ MWh
2011 _____ 0 _____ MWh

- b. Palmco did not begin serving load until June, 2012, and therefore cannot compute a baseline projection in compliance with 4901:1-40-03(B)(2)(a), as the average for the three previous years' sales is 0. In this instance, suppliers are required to determine their baseline as a "reasonable projection of its retail electric sales in the state for a full calendar year." However, as Palmco has never been active in the Ohio Market, Palmco believes that reporting actual retail sales data provides a more accurate figure than a projected baseline, and is consistent with Section 4928.64 (B). Palmco therefore reports as its 2012 baseline for subsequent compliance obligations, total actual sales.

2012 Baseline: 2,941 MWh

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

Table 1: 2012 Obligations

Types	RECs Required	RECs Obtained	Registry	RECs Sited in Ohio
Solar				

Non-Solar	
Total	

- a. The REC requirements cited above were determined by multiplying Palmco's actual 2012 load by .06% for solar RECs and 1.44% for non-solar RECs, in order to meet the 1.5% benchmark for total alternative energy procurement.
- b. Palmco has not pursued and does not request a force majeure determination for minimum renewable or solar-energy benchmarks.
- c. All of the RECs used by Palmco for compliance were procured through Palmco's GATS account, as required under 4901:1-40-04(D)(2). RECs used for compliance have been retired.
- d. The number of RECs Sited in Ohio were procured from generation facilities located within the state of Ohio in compliance with 4901:1-40-03(A)(2)(a).

IV. Compliance

Palmco states that it does not request adjustments for the required number of non-solar and solar RECs permitted pursuant to Rule 4901:1-40-05(A)(3). Palmco certifies that it will remain compliant with the Alternative Energy Portfolio Standard requirements for annual renewable energy resource benchmarks from solar and non-solar energy sources as demonstrated in Table 1.

V. Ten Year Forecast

- a. In accordance with Rule 4901:1-40-03(C), Palmco hereby provides a projection for the next ten years of solar and non-solar renewable energy benchmark obligations based on forecast load.

Table 2: Forecast Compliance Obligations

Year	Projected Load	Solar RECs	Non-Solar RECs	Total RECs
2013				
2014				
2015				
2016				
2017				
2018				
2019				
2020				
2021				
2022				

- b. Supply Portfolio Projections

Palmco does not own generation assets that can be used for Ohio compliance and does not purchase bundled electricity. Palmco has and plans to continue to purchase RECs on the spot market on an as needed basis from suppliers who have received renewable energy facility certificates from the Public Utilities Commission of Ohio.

c. Methodology used to evaluate Compliance

Palmco only recently began serving customers in Ohio, and has made projections based on the limited data available. Because customers are free to contract with any CRES or governmental aggregator or receive utility Standard Offer Service, predicting future sales levels is difficult, and therefore Palmco has assumed that load will remain constant after a period of initial growth.

d. Perceived impediments to achieving compliance with required benchmarks

Palmco has no comments at this time.

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER

ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2012

I, Robert Palmese, am a duly authorized representative of Palmco Power OH, LLC, and state to the best of my knowledge and belief that all information contained in the foregoing Annual Alternative Energy Portfolio Status Report for Calendar Year 2012, including any exhibits and attachments, is true, correct and complete.



Robert Palmese
Palmco Power OH, LLC

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). 13-0930-EL-ACP

Summary: Report Annual Alternative Energy Portfolio Status Report for Calendar Year 2012
electronically filed by Ms. Erika L Schmitt on behalf of Palmco Power OH, LLC and Mr. Robert
Palmese