

April 15, 2014

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

Re: Palmco Power OH, LLC 2013 Alternative Energy Portfolio Status Report, Public Version Case No. 14-0657-EL-ACP

Dear Ms. McNeal,

Included in this filing is a redacted version of Palmco Power OH, LLC's 2013 Alternative Energy Portfolio Status Report. In accordance with Rule 4901-1-24(D) of the Ohio Administrative Code, a motion for protective order will be filed and three copies of the confidential version of the report will be submitted under seal to the Commission. Please contact the undersigned with questions or concerns regarding this submission.

Thank you,

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Erika Schmitt Customized Energy Solutions, Ltd. Email: <u>eschmitt@ces-ltd.com</u> 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 2013) of Palmco Power OH, LLC)

Case No. 14-0657-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 had retail sales during only one of the three preceding calendar years as shown below:

2010	0	MWh
2011	0	MWh
2012	2,941	MWh

b. Palmco began serving load in June, 2012. In accordance with Section 4901:1-40-03(B)(2)(a), which establishes rules for suppliers that have not continuously served load during the previous three calendar years, Palmco has calculated its baseline as the "average of annual sales data for all calendar years during the preceding three years in which the electric services company was serving retail customers." Palmco therefore reports as its 2013 baseline for subsequent compliance obligations, total sales for 2012.

2013 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:

Types	RECs	RECs Obtained	Registry	RECs Sited in Ohio		
	Required					
Solar	3					
Non-Solar	56			Concernant and the second		
Total	59					

Table 1: 2013 Obligations

a. The REC requirements cited above were determined by multiplying Palmco's 2013 baseline load by 0.09% for solar RECs and 1.91% for non-solar RECs, in order to meet the 2% 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.

Year	Projected Load	Solar RECs	Non-Solar RECs	Total RECs
2014				
2015				
2016				
2017				
2018				
2019				
2020				
2021				
2022				
2023				

Table 2: Forecast Compliance Obligations

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 generation facilities that have received renewable energy facility certificates from the Public Utilities Commission of Ohio.

c. Methodology used to evaluate Compliance

Palmco has been serving customers in the Ohio market for nearly two years, and has made projections based on the historical 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 2013

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 2013, including any exhibits and attachments, is true, correct and complete.

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Robert Palmese Palmco Power OH, LLC

This foregoing document was electronically filed with the Public Utilities

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4/15/2014 11:27:39 AM

in

Case No(s). 14-0657-EL-ACP

Summary: Report for Palmco Power OH, LLC's Annual Alternative Energy Portfolio 2013 Status Report electronically filed by Ms. Erika L Schmitt on behalf of Palmco Power OH, LLC and Palmese, Robert Mr.