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April 15, 2014

Ms. Barcy F. McNeal, Secretary
Public Utilities Commission of Ohio
180 E. Broad St., 11th Floor
Columbus, OH 43215-3793

Re: Case No. 14-659-EL-ACP
Hudson Energy Services, LLC
Public Version

Dear Ms. McNeal:

I am filing a redacted version of the Alternative Energy Compliance Report for Calendar Year 2013 for Hudson Energy Services, LLC. This report is redacted because it contains certain confidential and proprietary information. Pursuant to 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 this report are being submitted under seal.

Thank you for your consideration.

Sincerely yours,

Stephen M. Howard
Attorneys for Hudson Energy Services, LLC

SMH/jaw
Enclosure

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
ALTERNATIVE ENERGY ANNUAL STATUS REPORT FOR CALENDAR YEAR 2013

Hudson Energy Services, LLC (hereinafter "Hudson Energy") in accordance with Sections 4928.64 and 4928.65, Ohio Revised Code and Commission Rules 4901:1-40-03 and 4901:1-40-05 hereby submits this Alternative Energy Annual Status Report ("AER") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

1. Determination that an Alternative Energy Resource Report is Required (check one)

- ☒ During calendar year 2013 the CRES states that it conducted retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.
- ☐ During calendar year 2013 the CRES states that it did not conduct retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.

2. Determination of the sales baseline for 2013

- a. During the past three calendar years the CRES made retail sales of generation in the amounts shown below:

2010 MWh	0
2011 MWh	0
2012 MWh	0

- b. The average annual sales of the active years listed above (sum of the active years' MWh / number of active years hereinafter "Baseline Sales")

0

- c. If conditions exist that merit an adjustment to the Baseline Sales please list the adjusted Baseline Sales and attach as an exhibit to this AER a full explanation of the reason(s) for the adjustment(s).

0

- d. If the CRES was not active during calendar years 2010, 2011 and 2012 but did make sales during calendar year 2013, please project the amount of retail electric generation sales anticipated for the whole of calendar year 2013 as would have been projected on the first day retail generation sales were made in Ohio.

11,795

3. Determination of the number of Solar and Total Renewable Energy Credits (RECs) Required and Statement of the Number of RECs Claimed

RENEWABLE ENERGY CREDITS REQUIRED AND OBTAINED FOR 2013				
Types	(A) No. of RECs Required	(B) No. of RECs Obtained	(C) Registry	(D) No. of RECs Sited in OH
Solar	106	106	PJM-GATS	53
Non Solar	130	130	PJM-GATS	65
Total	236	236	PJM-GATS	118

- a. Column A above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2013. The determinations were calculated by multiplying the:

<input checked="" type="checkbox"/>	Baseline Sales
<input type="checkbox"/>	Adjusted Baseline Sales
<input type="checkbox"/>	Projected Sales

by 9 hundredths of one per cent (.09%) for Solar RECs, by one and 91 hundredths percent (1.91%) for Non-Solar RECs, and two percent (2.0%) for total RECS. Total RECs include both Solar and Non Solar RECs.

- b. The CRES states that it has obtained in accordance with the Commission's Rules the number of Solar and Non Solar RECs listed in column B above for 2013.

Approved registry being used by the CRES: PJM-GATS

- c. The CRES states that of the RECs it has obtained for 2013 the number listed in column D represents the RECs with generation facilities sited within the state of Ohio.

CRES states that it has

<input type="checkbox"/>	Received a force majeure determination for solar RECs
<input type="checkbox"/>	Sought but has yet to receive a ruling on a force majeure determination for Solar RECs
<input checked="" type="checkbox"/>	Did not seek and did not receive a force majeure determination for solar RECs

4. Compliance (check one)

<input checked="" type="checkbox"/>	CRES states that it has obtained the required number of Solar RECs and total RECs without adjustments permitted pursuant to Rule 4901:1-40-05(A)(3).
<input type="checkbox"/>	CRES states that it has obtained the required number of Solar RECs and total RECs after adjustments permitted pursuant to Rule 4901:1-40-05(A)(3).
<input type="checkbox"/>	CRES states that it is not in compliance with number of Solar RECs or total RECs required for 2013.

5. Ten Year Forecast

a. Ten Year Forecast of Solar and Non-Solar RECs

In accordance with Rule 4901:1-40-03(C) the CRES hereby provides a projection for the next 10 years for RECs and Solar RECs.

10 Year Forecast of Solar and Non-Solar RECs				
Year	Estimated Sales	Estimated Solar	Estimated Non-Solar	Estimated Total RECs
2014				
2015				
2016				
2017				
2018				
2019				
2020				
2021				
2022				
2023				

- b. Supply Portfolio projection
Just Energy purchases supply based on short term annual contracts.
- c. Methodology used to evaluate compliance.

Just Energy is not developing and does not own any renewable generation that would qualify under the Ohio RPS program. Instead, Just Energy purchases renewable energy under third- party contractual agreements to meet its RPS procurement obligations. Just Energy will purchase renewable energy on an annual basis based on projected sales, hedging against risks with other procurement options. This procurement process will account for the various portfolio content category requirements, and will ensure that Just Energy has sufficient procurement from each portfolio content category to satisfy the requirements in accordance with Ohio law (Revised Code Section 4928.64). After the end of each year and each compliance period, Just Energy will true up its purchases and re-evaluate its retail sales data, to help ensure it will purchase and procure sufficient renewable energy to meet its RPS procurement and portfolio content category requirements.

- d. Comments on any perceived impediment(s) to achieving compliance with the solar and non-solar REC requirements, as well as any discussion addressing such impediments.

Just Energy obtained all the required REC's for the 2013 reporting period.

I, Richard Hill, Compliance Supervisor, am the duly authorized representative of Commerce Energy of Ohio, Inc. d/b/a Just Energy 6345 Dixie Red, Suite 200, Mississauga, Ontario, Canada, and state, to the best of my knowledge and ability, all the information contained in the foregoing Competitive Retail Electric Service Provider Alternative Energy Annual Status Report for Calendar Year 2013, including any exhibits and attachments, are true, accurate and complete.



Signature

Richard Hill
Supervisor - Compliance
Hudson Energy Services, LLC.

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 14-0659-EL-ACP

Summary: Report Public Version of Alternative Energy Compliance Report for Calendar Year 2013 electronically filed by Mr. Stephen M Howard on behalf of Hudson Energy Services, LLC