

In the Matter of the Alternative Energy Case

Portfolio Status Report of Land O'Lakes, Inc.

I. Introduction

Land O'Lakes, Inc. ("LOL"), Competitive Retail Electric Service ("CRES") provider is an electric services company as defined in Section 4928.01(A)(9), Ohio Revised Code, and is subject to Rule 4901:1-40-05(A)(1), Ohio Administrative code ("OAC"), which requires electric service companies to submit an Annual Alternative Energy Portfolio Status Report detailing compliance with the advanced and renewable energy benchmarks specified in Section 4928.64(B), Revised Codes, and Rule 4901:1-40-03(A), OAC for the preceding calendar year. LOL hereby submits its alternative energy portfolio status for the calendar year 2014.

II. Determination of Retail Sales in Calendar Year 2014

During the calendar year 2014, the CRES states that it conducted retail sales of generation to its own facilities who utilized the generation in a load center located within the state of Ohio.

III. 2014 Benchmarks

Section 4928.64(B)(2), Ohio Revised Code, and Rule 4901:1-40-03(A), OAC, and Ohio Senate Bill 310 states that electric services companies for 2014 are required to supply 2.5% of the electricity delivered to their Ohio customers from non-solar renewable energy resources and 0.12% delivered from solar renewable energy resources.

IV. 2014 Baseline and Compliance Status

Normally, the electric service company's baseline is calculated by averaging the total number of kilowatthours (kWh) sold during the 3 preceding calendar years. LOL started serving its own facilities in Ohio during November of 2013. Ohio Code Section 4901:1-40-03 (B)1(a) states, "If an electric services company has not been continuously supplying Ohio retail electric customers during the preceding three calendar years, the baseline shall be computed as an average of annual sales data for all calendar years during the preceding three years in which the electric services company was serving retail customers."

For compliance year 2014, the previous three years in which Land O Lakes had sales was only 2013. Therefore the 2013 sales amount, 1,324,000 kWh or 1,324 MWh, should be used as the baseline.

Renewable Type	Baseline (MWh)	Requirement	Benchmark (MWh)
Solar	1,324	0.12%	2
Non-Solar	1,324	2.50%	33

In accordance with Rule 4901:1-40-08(A), OAC, the renewable compliance payment applicable to LOL shall be rounded to the nearest MWh. As a result, the applicable 2014 MWh benchmarks in the table above have been rounded to a total of 2 MWh for solar and 33 MWh for non-solar. Pursuant to Section 4928.65, Ohio Revised Code, electric companies may meet their renewable energy benchmarks through the use of renewable energy credits ("RECs") and solar renewable energy credits ("SRECs").

V. Baseline for Future Calendar Years

As stated in Section IV above, LOL does not have 3 years of historical data and, in fact, only has a little over a thirteen (13) months of actual historical data from 2013 and 2014. Therefore, LOL will use an estimate of its annual electricity delivered to its facilities utilizing previous years' actual meter data. This estimation will be used until such time that a baseline can be calculated using 3 years of actual annual energy delivered to the LOL facilities by LOL.

VI. Ten Year Forecast

In accordance with Rule 4901:1-40-03(C), LOL hereby provides a projection for the next 10 years for RECs and SRECs. Projections are based on the changes made by Ohio Senate Bill 310, approved in May 2014, which froze Ohio's renewable energy and energy efficiency standards at 2014 levels for two years. The original schedule laid out in Senate Bill 221 will resume in 2017. This bill also eliminates Ohio in state energy requirements and allows utilities and CRES to fulfill Alternative Energy requirements with out of state resources.

Year	Non-Solar Renewable %	Solar Renewable %	Non-Solar Renewable (MWh)	Solar Renewable (MWh)
2015	2.50%	0.12%	317	15
2016	2.50%	0.12%	317	15
2017	3.50%	0.15%	443	19
2018	4.50%	0.18%	570	23
2019	5.50%	0.22%	697	28
2020	6.50%	0.26%	823	33
2021	7.50%	0.30%	950	38
2022	8.50%	0.34%	1,077	43
2023	9.50%	0.38%	1,203	48
2024	10.50%	0.42%	1,330	53

Supply Portfolio Projection, Including both generation Fleet and Power Purchase

LOL does not intend to construct or purchase any electric generation facilities. Therefore, LOL will continue to supply power to its facilities by purchasing power through the wholesale market.

VIII. Description of Methodology Used to Evaluate Compliance Options

LOL does not own or anticipate any electric generation facilities in its future. Thus, LOL's future renewable energy source compliance strategy is to purchase the required RECs and SRECs through market entities.

IX. Perceived Impediments to Achieving Compliance with Required Benchmarks

With the exception of diminutive quantities as discussed in Section IV, LOL does not foresee future impediments at the time of this filing.

X. Conclusion

LOL respectfully requests that the Commission find that LOL has complied with the applicable renewable energy resource benchmarks for 2014 and its associated reporting requirements.

I, Kevin Shriver, am a duly authorized representative and officer of Land O'Lakes, Inc. and state, to the best of my knowledge and ability, all the information contained in the foregoing Annual Alternative Energy Portfolio Status Report for Calendar Year 2014, including exhibits, are true, accurate and complete.

Kevin Shriver

VP, Sourcing & Commodity Merchandising

Land O'Lakes, Inc.

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Summary: Report 2014 Alternative Energy Portfolio Standards Compliance Report for Land O Lakes Inc. electronically filed by Mr. Patrick W Frazier on behalf of Land O'Lakes