

VORYS

Vorys, Sater, Seymour and Pease LLP
Legal Counsel

52 East Gay St.
PO Box 1008
Columbus, Ohio 43216-1008

614.464.6400 | www.vorys.com

Founded 1909

Stephen M. Howard
Direct Dial (614) 464-5401
Direct Fax (614) 719-4772
Email smhoward@vorys.com

April 10, 2015

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

Re: Case No. 15-704-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 2014 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 two 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 RESOURCES REPORT FOR CALENDAR YEAR 2014

Hudson Energy Services, LLC (hereinafter "CRES") in accordance with Sections 4928.64, 4928.643 and 4928.65, Ohio Revised Code and Commission Rules 4901:1-40-03 and 4901:1-40-05 hereby submits this Annual Alternative Energy Report ("AER") detailing compliance with the Ohio Alternative Energy Portfolio Standards.

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

- During calendar year 2014 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 2014 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. (If this block is checked proceed to the signature line)

II. Determination of the sales baseline for 2014

The CRES will mark the applicable options below in the determination of the sales baseline for 2014.

- a. The baseline is computed as an average of the three preceding calendar years (listed below) of the total annual number of kilowatt-hours of electricity sold to any and all retail electric consumers served by the CRES in Ohio, based upon the kilowatt-hours sales in the CRES' most recent quarterly market-monitoring reports or reporting forms. That average is _____ MWh.

2011	_____	MWh
2012	_____	MWh
2013	_____	MWh

- b. The CRES has not been continuously supplying Ohio retail electric customers during the preceding three calendar years; therefore, the baseline shall be computed as an average of annual sales data for all calendar years during the preceding three years (listed below) in which the CRES was serving retail customers. That average of annual sales data for all such calendar years is 11,795 MWh.

2011	_____	MWh
2012	_____	MWh
2013	<u>11,795</u>	MWh

- c. The CRES had no retail electric sales in Ohio during the preceding three calendar years; therefore, its initial baseline shall consist of a reasonable projection of its retail

electric sales in Ohio for a full calendar year. That reasonable projection of its retail electric sales in Ohio for the full calendar year of 2014 is _____. Subsequent baselines shall consist of actual sales data.

- d. Beginning with compliance year 2014, a CRES may choose for its baseline the total kilowatt hours sold to any and all applicable retail consumers located in Ohio in 2014 who are served by the CRES. Such actual sales in 2014 was _____ MWh.
- e. A CRES may file an application requesting a reduced baseline to reflect new economic growth in its service territory or service area. Any such application shall include a justification including why timely compliance based on the unadjusted baseline is not feasible, a schedule for achieving compliance based on its unadjusted baseline, quantification of a new change in the rate of economic growth, and a methodology for measuring economic activity, including objective measurement parameters and quantification methodologies.

III. 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	No. of RECs Required (a)	No. of RECs Obtained (b)	Registry (c)
Solar	14	14	PJM-GATS
Non Solar	281	281	PJM-GATS
Total	295	295	PJM-GATS

- a. Column (a) above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2014. The determinations were calculated by multiplying the Baseline Sales by 12 hundredths of one per cent (.12%) for Solar RECs and 238 hundredths percent (2.38%) for non-Solar 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 2014.
- c. The CRES used the PJM GATS/M-RETS registry for the RECs detailed above.
- d. CRES states that it did not seek and did not receive a *force majeure* determination for Solar RECs.

IV. Compliance (check one)

- 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).

- 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). The type adjustment, reason for the adjustment and merit for making the requested adjustment of the proposed adjustments are detailed in an exhibit attached to this Report.
- CRES states that it is not in compliance with number of Solar RECs or Total RECs required for 2014.

V. 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.

Year	Solar RECs	Non-solar RECs	Total RECs
2015			
2016			
2017			
2018			
2019			
2020			
2021			
2022			
2023			
2024			

b. The Supply Portfolio projection is based upon:

Hudson Energy purchases supply based on short-term annual contracts.

c. The Methodology used to evaluate compliance is based upon:

Hudson Energy is not developing and does not own any renewable generation that would qualify under the Ohio RPS program. Instead, Hudson Energy purchases renewable energy under third-party contractual agreements to meet its RPS procurement obligations. Hudson 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 insure that Hudson 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, Hudson 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 sales data, to help ensure it will purchase and procure sufficient renewable energy to meet its RPS procurement and portfolio content category requirements.

- d. Optional 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.

Hudson Energy obtained all the required RECs for the 2014 reporting period.

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER

ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2014

I, Blake Lasuzzo, Sr. Vice President - Supply, am the duly authorized representative of Hudson Energy Services, LLC, 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 2014, including any exhibits and attachments are true, accurate and complete.



Signature

Blake Lasuzzo
Sr. Vice President – Supply
Hudson Energy Services, LLC

Hudson Energy Services, LLC - Reserve Subaccount Details - OH - Jan 2014 - Dec 2014

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number
Default	ATSI	07/2012	NON54955	MCM Precision Castings - MCM Precision Castings	OH	SUN	473146 - 1 to 10	10	11-SPV-OH-GATS-2377
Default	ATSI	07/2012	NON58274	Adams, John Residence - J Adams	OH	SUN	475309 - 1 to 1	1	12-SPV-OH-GATS-0229
Default	ATSI	08/2012	NON64077	Goodine, Mark Residence - Goodine, Mark Residence	OH	SUN	501087 - 1 to 1	1	12-SPV-OH-GATS-0914
Default	ATSI	08/2012	NON66968	Gray, Carl Residence - Gray, Carl Residence	OH	SUN	546415 - 1 to 1	1	12-SPV-OH-GATS-0915
Default	ATSI	08/2012	NON64300	Hoffman, Mark Residence - Hoffman, Mark Residence	OH	SUN	501225 - 1 to 1	1	12-SPV-OH-GATS-0926
Default	ATSI	01/2012	MSET89504101	AEP SUMMERVILLE 1-2 H - 1	WV	WAT	345967 - 8302 to 8582	281	09-HYD-WV-GATS-0082

Hudson Energy Services, LLC - Reserve Subaccount Details - OH - Jan 2014 - Dec 2014

Solar Renewable Energy Source	Renewable Energy Source	RPS	RPS Price	RPS Period	Deposit Date
Yes		Yes	\$90.00	2014	04/02/2015
Yes		Yes	\$90.00	2014	04/02/2015
Yes		Yes	\$90.00	2014	04/02/2015
Yes		Yes	\$90.00	2014	04/02/2015
Yes		Yes	\$90.00	2014	04/02/2015
	Yes	Yes	\$14.00	2014	04/02/2015

Subaccount	Zone	Name	Month/ Ye	Unit ID	Facility	Nat	State	Fuel Type	Certificate	Quantity	State Certifi	Solar Rene	Renewable	RPS	RPS Price	RPS Period	Deposit Date
Default	ATSI		Jul-12	NON54955	MCM	Preci	OH	SUN	473146 - 1	10	11-SPV-OH	Yes	Yes	Yes	\$90.00	2014	4/2/2015
Default	ATSI		Jul-12	NON58274	Adams, Jof	OH	SUN	475309 - 1	1	12-SPV-OH	Yes	Yes	Yes	Yes	\$90.00	2014	4/2/2015
Default	ATSI		Aug-12	NON64077	Goodline, N	OH	SUN	501087 - 1	1	12-SPV-OH	Yes	Yes	Yes	Yes	\$90.00	2014	4/2/2015
Default	ATSI		Aug-12	NON66968	Gray, Carl I	OH	SUN	546415 - 1	1	12-SPV-OH	Yes	Yes	Yes	Yes	\$90.00	2014	4/2/2015
Default	ATSI		Aug-12	NON64300	Hoffman, N	OH	SUN	501225 - 1	1	12-SPV-OH	Yes	Yes	Yes	Yes	\$90.00	2014	4/2/2015
Default	ATSI		Jan-12	MSET8950	AEP SUMM	WV	WAT	345967 - 8	281	09-HYD-WV	GATS-008	Yes	Yes	Yes	\$14.00	2014	4/2/2015

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/10/2015 3:22:44 PM

in

Case No(s). 15-0704-EL-ACP

Summary: Report Alternative Energy Compliance Report for Calendar Year 2014 - Public Version electronically filed by Mr. Stephen M Howard on behalf of Hudson Energy Services, LLC