# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)		
Interstate Gas Supply Inc, For Approval	)		
of its Alternative Energy Annual Status	)	Case No.	15-0722 -EL-ACP
Report	)		
•	)		

#### I. INTRODUCTION

Pursuant to Rule 4901:1-40-05 of the Ohio Administrative Code ("O.A.C."), Interstate Gas Supply Inc, ("IGS") submits its Annual Status Report ("Report") for the period January 1, 2014 through December 31, 2014 ("Reporting Period"). This Report addresses IGS's compliance with the alternative energy portfolio benchmarks set forth in R.C. § 4928.64(B) (2) for the Reporting Period.

IGS is in compliance with its statutory non-solar and solar Alternative Energy Portfolio Standard ("AEPS") requirements for 2014. As demonstrated below, IGS met its requirements by obtaining Renewable Energy Credits ("RECs") and retiring those RECs in the PJM Generation Attribute Tracking System ("GATS") using the Reserve subaccount.<sup>1</sup>

## II. COMPLIANCE WITH 2014 BENCHMARKS

O.A.C. 4901:1-40-05(A) requires that each electric utility and electric services company file "an annual alternative energy portfolio status report analyzing all activities undertaken in the previous calendar year to demonstrate how the applicable alternative energy portfolio benchmarks and planning requirements have or will be met." O.A.C. 4901:1-40-05(A) also requires that the Commission Staff conduct an annual compliance review of the electric utility or

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 $<sup>^{\</sup>rm 1}$  REC retirement data is available to Staff through the GATS system.

electric services company's compliance with benchmarks under the alternative energy portfolio standard.

R.C. 4928.64(B) (2) and O.A.C. 4901:1-40-03(A) contain the alternative energy benchmarks applicable to electric services companies such as IGS. By 2026, IGS must provide twelve and half percent of its electricity from alternative energy resources. R.C. § 4928.64(B). One half of one percent must be supplied from renewable energy resources. R.C. § 4928.64(B) (2). The law further requires that at least one-half percent of the twelve and half percent must be supplied from solar energy resources by 2026. *Id.* The law sets annual benchmarks for both renewable energy and solar energy. *Id.* For 2014, IGS was required to supply 2.5% of its electricity supply from renewable energy resources and 0.12% of its electricity supply from solar energy resources. The Commission's rules require that renewable and solar energy resources implemented by IGS must be met through facilities located in Ohio, or shall be met with resources that can be shown to be delivered into Ohio. *Id.* 4901:1-40-03(A)(2)(a).

## A. Initial Baseline Calculation

Ordinarily, an electric service company's baseline is to be computed by averaging the number of kilowatt-hours sold during the three preceding calendar years. IGS however, had no electric sales in Ohio during the year 2011. In such a case, Ohio Admin. Code § 4901:1-40-03(B)(2)(b) provides:

For an electric services company with no retail electric sales in the state during the preceding three calendar years, its initial baseline shall consist of a reasonable projection of its retail electric sales in the state for a full calendar year.

As such, for its initial baseline IGS shall use its actual sales numbers for 2012 and 2013 as its initial baseline. IGS initial baseline used for these years for the purposes of this report is 842,972 MWH.

## A. Non-Solar Benchmark

IGS was able to meet one hundred percent of its non-solar Ohio AEPS compliance obligations in 2014. The Company acted diligently and proactively to procure RECs from existing renewable resources located within the borders of the state of Ohio and adjacent states to demonstrate compliance with this portion of the compliance obligation. These RECs were retired in GATS using the Reserve subaccount. **Table 1** below indicates IGS Compliance with IGS's non-solar benchmarks.

## B. Solar Benchmark

IGS was able to meet one hundred percent of its solar Ohio AEPS compliance obligations in 2014. The Company acted diligently and proactively to procure SRECs from solar resources located within the borders of the state of Ohio and adjacent states to demonstrate compliance. These SRECs were retired in GATS using the Reserve subaccount. **Table 1** below indicates IGS's compliance with its solar benchmarks.

Table 1				
Year	Actual Load (MWhrs)	Non-Solar	Solar	
2014	842,972	20,063	1,012	

### IV. CONCLUSION

As demonstrated above, IGS achieved full compliance with the 2014 renewable energy benchmark in R.C. § 4928.64(B)(2).

Respectfully Submitted

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