# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)		
FirstEnergy Solutions Corp. For Approval	)		
of its Alternative Energy Annual Status	)	Case No.	15-0744-EL-ACP
Report	)		
	)		

## I. Introduction

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

FES is in compliance with its statutory non-solar and solar Alternative Energy Portfolio Standard ("AEPS") requirements for 2014. As demonstrated below, FES 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) and (C)

<sup>&</sup>lt;sup>1</sup> REC retirement data is available to Staff through the GATS system (GATS Account Names are "FirstEnergy Solutions Corp." and "FirstEnergy Solutions Corp. (Voluntary)").

also require that the Commission Staff conduct an annual compliance review of the electric utility or electric services company's compliance with benchmarks under the AEPS.

R.C. § 4928.64(B) and O.A.C. 4901:1-40-03(A) contain the alternative energy benchmarks applicable to electric services companies such as FES. By 2027, FES must source 12.5 percent of its electricity from qualifying renewable energy resources. R.C. § 4928.64(B)(1). Such resources may be obtained through facilities located in Ohio or deliverable into Ohio. *Id.* at (B)(3). At least one-half percent of the 12.5 percent must be supplied from solar energy resources. *Id.* at (B)(2). The law sets annual benchmarks for both renewable energy and solar energy. *Id.* For 2014, FES 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. *Id.* 

FES elects its baseline, as defined in R.C. 4928.643(B), to be the total kilowatt hours sold to consumers located in Ohio during the 2014 compliance year. The renewable requirements for the year 2014 under the Ohio AEPS is shown in Table 1, below. Table 1 also demonstrates the number of RECs that FES needed to obtain to meet its benchmarks.

Table 1.

		liance Plan Status Report Summary S	•		
	Sales	Proposed	Sales	Source of	
		Adjustments (MWHs)	Adjusted (MWHs)	Sales Volume Data	
2011	Olidajusted (WWTIS)	0	0	Sales Volume Data	(A)
2012		0	0		(B)
2013		0	0		(C)
aseline fo	or 2014 Compliance Obligation (MWHs	)	41,985,779		(D) = AvgABC
2.50%	2014 Statutory Compliance Obligati	on			
	2014 Non-Solar Renewable Benchm	nark	2.38% 0.12%		(E)
	2014 Solar Renewable Benchmark				(F)
	Per ORC, 4928.64(B)(2)				
	2014 Compliance Obligation				
	Non-Solar RECs Needed for Com		999,262		(G) = (D) * (E)
	Solar RECs Needed for Compliance	ce	50,383		(H) = (D) * (F)
	Carry-Over from Previous Year(s), i	f applicable			
	Non-Solar (RECs)		0		(1)
	Solar (S-RECs)		0		(1)
	Total 2014 Compliance Obligations				
	Non-Solar RECs Needed for Com	oliance	999,262		(K) = (G) + (I)
	Solar RECs Needed for Compliance	ce	50,383		(L) = (H) + (J)
	2014 Performance (Per GATS or MR	ETS Data)			
	Non-Solar (RECs)		999,262		(M)
	Solar (S-RECs)		50,383		(N)
	Under Compliance in 2014, if applic	able			
	Non-Solar (RECs)		0		(O) = (K) - (M)
	Solar (S-RECs)		0		(P) = (L) - (N)
	2014 Alternative Compliance Paymo	ents			
	Non-Solar, per REC (Refer to Case	e 14-0746-EL-ACP)	\$49.22		(Q)
	Solar, per S-REC - per 4928.64(C)(	2)(a)	\$300.00		(R)
	2014 Payments, if applicable				
	Non-Solar Total		\$0.00		(S) = (O) * (Q)
	Solar Total		\$0.00		(T) = (P) * (R)
	TOTAL		\$0.00		(U) = (S) + (T)

#### Α. Non-Solar Benchmark

FES met 100% of its non-solar Ohio AEPS compliance obligations in 2014. The Company acted diligently and proactively to procure RECs from existing renewable resources located either within Ohio or deliverable to Ohio to achieve compliance. RECs from the Pennsylvania wind power that FES has under a long-term renewable power purchase agreement fulfill a portion of FES's compliance with the out-of-state portion. These RECs were retired in GATS using the Reserve subaccount.

#### B. **Solar Benchmark**

FES met 100% of its solar Ohio AEPS compliance obligations in 2014. The Company acted diligently and proactively to procure SRECs from solar resources located either within Ohio or deliverable to Ohio to achieve compliance. SRECs from solar resources deliverable into Ohio were used to fulfill FES's compliance with the out-of-state portion. These SRECs were retired in GATS using the Reserve subaccount.

#### IV. **CONCLUSION**

As demonstrated above, FES achieved full compliance with its 2014 renewable energy benchmarks, as required by R.C. § 4928.64(B)(2).

Respectfully Submitted,

s/ Mark A. Hayden

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Summary: Application In the Matter of the Application of FirstEnergy Solutions Corp. For Approval of its Alternative Energy Annual Status Report electronically filed by Ms. Rebekah J. Glover on behalf of FirstEnergy Solutions Corp.