

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Alternative)	
Energy Portfolio Status Report of)	
Switch Energy, LLC)	Case No. 16-0810-EL-ACP
And)	
Plan for Compliance with Advanced)	
And Renewable Energy Benchmarks)	

**SWITCH ENERGY, LLC’S
ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT
AND
PLAN FOR COMPLIANCE WITH ADVANCED AND RENEWABLE ENERGY
BENCHMARKS**

I. Introduction

Switch Energy, LLC (“Switch”) is a competitive retail service (“CRES”) provider, as defined in Ohio Revised Code § 4928.01(A)(4), and an electric service company, as defined in Rev. Code § 4928.01(A)(9), having been issued Certificate No. 13-686E (1) by the Public Utilities Commission of Ohio (“Commission”). Switch provides electric supply to residential, commercial, mercantile and industrial consumers throughout the state of Ohio.

Pursuant to Rev. Code § 4928.64 and Ohio Administrative Code Rule 4901:1-40-05, all Ohio electric service companies are required to file, by April 15th of each year, an annual alternative energy portfolio status report. In this report, electric service companies are required to analyze “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.”

II. Annual Alternative Energy Portfolio Status Report

For calendar year 2015, Rev. Code § 4928.64(B)(2) and Admin. Code 4901:1-40-

03(A)(2) require electric service companies to demonstrate that 2.5 percent of the retail electricity sold was derived from renewable energy resources. Additionally, 0.12 percent of the electricity sold by electric service companies must have been generated by solar energy resources, which portion may also be counted toward the renewable energy resources target. The level of these benchmark requirements is determined by first establishing a baseline number of megawatt hours and then applying the benchmark percentages to that baseline.

A. Baseline Calculation

Under Rule 4901:1-40-03(B)(2), an electric service company's baseline is computed by averaging the number of megawatt hours sold during the three preceding years. As such, Switch, which commenced sales in Ohio in 2013, computes its baseline as the average of its 2013 and 2014 annual sales data. Calculations for Switch's baseline is provided below.

B. 2015 Renewable and Solar Energy Resource Benchmarks

Based on sales of 1,442 MWh for 2013, and 19,224 MWh for 2014, Switch calculated a baseline of 10,466 MWh for 2015. Based on this baseline, Switch's calculation of its benchmarks for electricity generated from renewable and solar energy resources for the year 2015 is as follows:

<u>2015 Baseline</u>	10,466 MWh
Total Renewable and Solar Requirement	262 MWh
2015 Renewable Requirement (Total Less Solar)	249 MWh
2015 Renewable Requirement (Total Less Non-Solar)	13 MWh

Switch's Compliance Plan Status Report Summary Sheet is attached as **Exhibit A**.

C. Demonstration of Compliance with 2015 Benchmarks

Pursuant to Ohio Rev. Code § 4928.65, electric service companies may meet their renewable energy benchmarks through the use of renewable energy credits ("RECs"). Switch has successfully met its renewable energy benchmarks using RECs. Switch significantly over-

complied with its REC requirements in 2014, and seeks to apply the excess to its 2015 compliance. To demonstrate compliance, Switch is submitting as **Exhibit B**, a copy of its REC Compliance Data from 2014, as well as **Exhibit D**, a copy of Switch's 2014 RPS Compliance Reporting Form.

1. Solar Renewable Energy Credits

Section 4901:1-40-03(A)(2) of the O.A.C. requires that all electric utilities and affected electric service companies demonstrate that 0.12% of their retail electric sales are generated by solar energy resources by the end of 2015. Switch has obtained sufficient solar RECs ("SRECs") to fully satisfy its 2015 SREC obligations.

2. Non-Solar, Renewable Energy Credits

By means of economically sound purchasing, Switch was able to obtain sufficient non solar adjacent state RECs to fully satisfy its 2015 REC obligations.

III. PLAN FOR COMPLIANCE WITH FUTURE ANNUAL ADVANCED AND RENEWABLE ENERGY BENCHMARKS

Rule 4901:1-40-03(C), O.A.C., requires that each electric service company file an annual plan for compliance with future annual advanced and renewable energy benchmarks, including solar, utilizing at least a ten-year planning horizon. The plan shall include the following items: (1) baseline for current and future calendar years; (2) supply portfolio projection, including both generation fleet and power purchases; (3) description of the methodology used by the company to evaluate its compliance options; and (4) a discussion of any perceived impediments to achieving compliance with required benchmarks, as well as suggestions for addressing any such impediments.

A. Baseline for Current and Future Calendar Years

In compliance with Section 4901:1-40-03(C) of the O.A.C., Switch is submitting as **Exhibit C** its compliance plan using a ten-year planning horizon.

B. Supply Portfolio Projection, Including Both Generation Fleet and Power Purchases

Switch has no plan to construct or purchase any electric generation facilities. Therefore, Switch will continue to supply power to its customers by purchasing power through the wholesale market.

C. Description of Methodology Used to Evaluate Compliance Options

The Supply Portfolio Projection is based upon a conservative view of growth. As noted above, Switch does not own or anticipate owning any generation facilities. Therefore, Switch will meet its alternative energy benchmarks through the purchasing of RECs and SRECs. See **Exhibit**

B.

D. Perceived Impediments to Achieving Compliance with Required Benchmarks

Aside from the potential for supply and pricing constraints in the market for RECs, Switch does not anticipate significant impediments to achieving compliance with its required benchmarks.

IV. CONCLUSION

Switch respectfully requests that the Commission find that Switch has complied with the applicable renewable energy resource benchmarks for 2015 and its associated reporting requirements.

Respectfully submitted,
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Exhibit A - Public

Compliance Plan Status Report for Compliance Year 2015
Summary Sheet

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data	
2012		0	0		(A)
2013		0	1,707		(B)
2014		0	19,224		(C)

Baseline for 2015 Compliance Obligation (MWHs)

10,466

(D) = AvgABC

(Note: If using 2015 sales as your baseline, insert that figure in cell I14 and indicate in box to right if 2015 sales are adjusted or not.

i.e., Not Adjusted

2.50%

2015 Statutory Compliance Obligation

2015 Non-Solar Renewable Benchmark

2.38%

(E)

2015 Solar Renewable Benchmark

0.12%

(F)

Per R.C., 4928.64(B)(2)

2015 Compliance Obligation

Non-Solar RECs Needed for Compliance

249

(G) = (D) * (E)

Solar RECs Needed for Compliance

13

(H) = (D) * (F)

Carry-Over from Previous Year(s), if applicable

Non-Solar (RECs)

0

(I)

Solar (S-RECs)

0

(J)

Total 2015 Compliance Obligations

Non-Solar RECs Needed for Compliance

249

(K) = (G) + (I)

Solar RECs Needed for Compliance

13

(L) = (H) + (J)

2015 Performance (Per GATS and/or MRETS Data)

Non-Solar (RECs)

(M)

Solar (S-RECs)

(N)

Under Compliance in 2015, if applicable

Non-Solar (RECs)

(O) = (K) - (M)

Solar (S-RECs)

(P) = (L) - (N)

2015 Alternative Compliance Payments

Non-Solar, per REC (Refer to Case 15-0461-EL-ACP)

(Q)

Solar, per S-REC (Refer to R.C. 4928.64(C)(2)(a))

(R)

2015 Payments, if applicable

Non-Solar Total

(S) = (O) * (Q)

Solar Total

(T) = (P) * (R)

TOTAL

(U) = (S) + (T)

*This compliance worksheet was developed by Staff for internal review purposes. However, it may be useful for your company in preparation of its RPS annual compliance status report for the **2015** compliance year. Your company is not required to include this form in its filing, but that is an option. If using this form, your company should insert data in the blue shaded boxes (as applicable). The remaining cells should auto-calculate. However, you should still independently verify the accuracy of the calculations. Questions concerning this worksheet can be addressed to Stuart.Siegfried@puc.state.oh.us*

Exhibit B - Public

Action	Unit ID	FacilityName	Fuel Type	Location of Generator	Month of Generation	Certificate Serial Numbers	Quantity	REC Creation
Transfer					11/1/2014			
Transfer					11/1/2014			
Transfer					3/1/2014			

Exhibit B - PUBLIC

Ohio
Solar Renewable Energy Source
Solar Renewable Energy Source
Renewable Energy Source

OH State Number	OH Eligibility End Date	Green-e Energy Eligible	EPEC Eligible	EPEC Certification Number

Exhibit C - PUBLIC

Supply Portfolio Projection

Year	Solar RECs	Non-solar RECs	Total RECs
2016			
2017			
2018			
2019			
2020			
2021			
2022			
2023			
2024			
2025			

Exhibit D - PUBLIC

Compliance Plan Status Report for Compliance Year 2014
Summary Sheet

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data
2011		0	0	(A)
2012		0	0	(B)
2013	1,442	0	1,442	(C)
Baseline for 2014 Compliance Obligation (MWHs)		1,442		(D) = AvgABC
<i>(Note: If using 2014 sales as your baseline, insert that figure in cell I14 and indicate in box to right if 2014 sales are adjusted or not. i.e., Not Adjusted)</i>				
2.50% 2014 Statutory Compliance Obligation				
2014 Non-Solar Renewable Benchmark		2.38%		(E)
2014 Solar Renewable Benchmark		0.12%		(F)
Per ORC, 4928.64(B)(2)				
2014 Compliance Obligation				
Non-Solar RECs Needed for Compliance		34		(G) = (D) * (E)
Solar RECs Needed for Compliance		2		(H) = (D) * (F)
Carry-Over from Previous Year(s), if applicable				
Non-Solar (RECs)		0		(I)
Solar (S-RECs)		0		(J)
Total 2014 Compliance Obligations				
Non-Solar RECs Needed for Compliance		34		(K) = (G) + (I)
Solar RECs Needed for Compliance		2		(L) = (H) + (J)
2014 Performance (Per GATS or MRETS Data)				
Non-Solar (RECs)				(M)
Solar (S-RECs)				(N)
Under Compliance in 2014, if applicable				
Non-Solar (RECs)				(O) = (K) - (M)
Solar (S-RECs)				(P) = (L) - (N)
2014 Alternative Compliance Payments				
Non-Solar, per REC (Refer to Case 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				(S) = (O) * (Q)
Solar Total				(T) = (P) * (R)
TOTAL				(U) = (S) + (T)

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Summary: Annual Report Annual Alternative Energy Portfolio Status Report electronically filed by Mr. Todd M Williams on behalf of Switch Energy, LLC