

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Titan Gas LLC d/b/a Titan Gas)	
and Power Annual Alternative Energy Portfolio)	Case No. 17-954-EL-ACP
Status Report and Plan for Compliance)	

I. INTRODUCTION

Titan Gas, LLC d/b/a Titan Gas and Power (“Titan”) is a competitive retail electric service (CRES) provider, as defined in Ohio Revised Code Section (“R.C.”) 4928.01(A)(4), and an electric services company as defined within R.C. 4928.01(A)(9). Titan currently provides electric supply to commercial and residential customers within the state of Ohio.

Titan hereby submits its Annual Alternative Energy Status Report for the period January 1, 2016 through December 31, 2016, as required by Ohio Administrative Code (“O.A.C.”) Rule 4901:1-40-05 for all electric service companies. As required by the rule, this status report identifies Titan's 2016 energy baseline, demonstrates its compliance with its 2016 renewable and solar energy benchmarks, and outlines its future alternative energy compliance strategy.

II. COMPLIANCE

Under R.C. 4928.64(B)(2) and O.A.C. Rule 4901:1-40-03(A)(2), for the year 2016, electric service companies must demonstrate that 2.5% of the retail electricity sold in Ohio be derived from renewable energy resources. Of this amount, electric service companies must demonstrate that 0.12% of the retail electricity they sold was derived from solar energy resources. Beginning in the 2014 compliance year, there is no longer a minimum in-state requirement. Therefore, Titan is not obligated to retire a certain number of renewable energy credits (“RECs”) or solar RECs (“S-RECs”) from Ohio renewable facilities for the 2016 reporting year. These benchmarks are determined by first calculating a baseline number of kilowatt hours and then applying the benchmark percentages to that baseline.

A. Initial Baseline Calculation

O.A.C. Rule 4901:1-40-03(B) sets forth the methodologies for calculating a baseline for compliance. Under O.A.C. 4901-40-03(B)(2)(a), for an electric supplier or electric services company that has not been continuously supplying retail electric customers for the preceding three 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.” However, under Amended Substitute Senate Bill S.B. 310, starting in compliance year 2014, a utility or company may choose for its baseline for compliance with the renewable energy resource requirements the total kilowatt hours sold to consumers in the applicable compliance year.

Titan has been continuously serving retail customers in Ohio since December 2013. Titan’s 2013 sales were 17.9 MWHs. Titan’s 2014 sales were 38,170 MWHs. Titan’s 2015 sales were 170,681 MWHs. Titan’s 2016 sales were 413,375 MWHs. Titan’s baseline for compliance with the renewable energy resource requirements is the total kilowatt hours sold to retail consumers in 2016.¹

B. 2016 Renewable and Solar Energy Benchmarks

Titan met all of its solar compliance obligations in 2016. Exhibit A, attached, provides details demonstrating Titan’s compliance.

C. Compliance with 2016 Renewable Energy Benchmarks

Titan met all of its solar compliance obligations in 2016. Exhibit A, attached, provides details demonstrating Titan’s compliance.

¹ Under R.C. 4928.643(B), “Beginning with compliance year 2014, a utility or company may choose for its baseline for compliance with the qualified renewable energy resource requirements of section 4928.64 of the Revised Code to be the total kilowatt hours sold to the applicable consumers, as described in division (A)(1) or (2) of this section, in the applicable compliance year.”

D. Titan's Compliance Strategy

As Titan's compliance obligations increase for 2016, Titan will utilize the broker market to satisfy its compliance obligation.

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

O.A.C. Rule 4901:1-40-03(C) requires all Ohio electric services companies to 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 must include a projected baseline for current and future calendar years, a supply portfolio projection, including generation fleet and power purchases, description of methodology the company uses to evaluate compliance options, and a discussion of any perceived impediments to achieving compliance. *Id.*

Attached to this compliance report, as Exhibit B, is Titan's projected growth over a ten-year planning horizon. For the purposes of this projection, the increasing annual sales in MWHs are based on a growth rate of 1,000 new customers per month. As a compliance strategy for the ten-year planning horizon, Titan intends to utilize the broker market to satisfy its compliance obligation. Titan has no intention of acquiring generation assets.

IV. CONCLUSION

Based on the foregoing, Titan respectfully requests that the Commission find that Titan has complied with the applicable renewable energy benchmarks for 2016.

Respectfully submitted,



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EXHIBIT A

**Compliance Plan Status Report for Compliance Year 2016
Summary Sheet**

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data	
2013	18	0	18		(A)
2014	38,170	0	38,170		(B)
2015	170,681	0	170,681		(C)
Baseline for 2016 Compliance Obligation (MWHs)			413,375		(D) = AvgABC
<i>(Note: If using 2016 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2016 sales are adjusted or not. i.e., Not Adjusted)</i>					
2.50%	2016 Statutory Compliance Obligation				
	2016 Non-Solar Renewable Benchmark		2.38%		(E)
	2016 Solar Renewable Benchmark		0.12%		(F)
	Per R.C., 4928.64(B)(2)				
	2016 Compliance Obligation				
	Non-Solar RECs Needed for Compliance		9,838		(G) = (D) * (E)
	Solar RECs Needed for Compliance		496		(H) = (D) * (F)
	Carry-Over from Previous Year(s), if applicable				
	Non-Solar (RECs)				(I)
	Solar (S-RECs)		0		(J)
	Total 2016 Compliance Obligations				
	Non-Solar RECs Needed for Compliance		9,838		(K) = (G) + (I)
	Solar RECs Needed for Compliance		496		(L) = (H) + (J)
	2016 Performance (Per GATS and/or MRETS Data)				
	Non-Solar (RECs)				(M)
	Solar (S-RECs)				(N)
	Under Compliance in 2016, if applicable				
	Non-Solar (RECs)		9,838		(O) = (K) - (M)
	Solar (S-RECs)		496		(P) = (L) - (N)
	2016 Alternative Compliance Payments				
	Non-Solar, per REC (Refer to Case 16-0714-EL-ACP)		\$49.75		(Q)
	Solar, per S-REC (Refer to R.C. 4928.64(C)(2)(a))		\$300.00		(R)
	2016 Payments, if applicable				
	Non-Solar Total		\$489,440.50		(S) = (O) * (Q)
	Solar Total		\$148,800.00		(T) = (P) * (R)
	TOTAL		\$638,240.50		(U) = (S) + (T)

For details on determining your compliance baseline, please refer to 4928.643, Ohio Revised Code (ORC), and 4901:1-40-03 of the Ohio Administrative Code (OAC).

Questions may also be posed to Staff at the following email address:

AEPS@puc.state.oh.us

*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 **2016** 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*

Forward Looking Requirements

Year	MWHS	RECS %	SOLAR %	RECS	SOLAR
2016	413,375	2.38%	0.12%	9,838	496
2017	556,174	3.35%	0.15%	18,632	834
2018	748,920	4.32%	0.18%	32,353	1348
2019	941,667	5.28%	0.22%	49,720	2072
2020	1,134,413	6.24%	0.26%	70,787	2949
2021	1,327,160	7.20%	0.30%	95,556	3981
2022	1,519,906	8.16%	0.34%	124,024	5168
2023	1,712,653	9.12%	0.38%	156,194	6508
2024	1,905,399	10.08%	0.42%	192,064	8003
2025	2,098,146	10.89%	0.46%	228,488	9651
2026	2,290,892	12.00%	0.50%	274,907	11454
2027	2,483,639	12.00%	0.50%	298,037	12418
2028	2,676,386	12.00%	0.50%	321,166	13382

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Summary: Application of Titan Gas LLC d/b/a Titan Gas and Power Annual Alternative Energy Portfolio Status Report and Plan for Compliance electronically filed by Teresa Orahod on behalf of Dylan F. Borchers