



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 13, 2017

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

Re: Case No. 17-0988 -EL-ACP
Liberty Power Holdings, LLC
Public Version of 2016 Alternative Energy Annual Status Report

Dear Ms. McNeal:

I am submitting to you a redacted version of the Alternative Energy Annual Status Report for calendar year 2016 on behalf of Liberty Power Holdings, LLC. Certain portions of information have been redacted because they contain confidential and proprietary information. A motion for protective order is also being filed today seeking protection of such information. Pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, I will be submitting under seal a copy of the confidential version of the Alternative Energy Annual Status Report for calendar year 2016 for Liberty Power Holdings, LLC.

Thank you for your consideration.

Sincerely yours,

Stephen M. Howard
Attorneys for Liberty Power Holdings, LLC

SMH/jaw
Enclosures



**Staff's Optional RPS Compliance Filing Report
2016 Compliance Year**

Company Name: Liberty Power Holdings, LLC

Case Number (i.e., XX-XXXX-EL-ACP): 17-0988-EL-ACP

Point of Contact for RPS Filing – Name: Michelle Castillo

Point of Contact for RPS Filing – Email: compliance@libertypowercorp.com

Point of Contact for RPS Filing – Phone: 954-489-7142

If CRES, provide Ohio certification number: Certificate No. 07-137E(6)

If CRES, provide certification case number: 06-1388-EL-CRS

Did the Company have Ohio retail electric sales in 2016?

YES ☒ NO ☐

If a CRES with sales in 2016, confirm the sales were conducted either as a power marketer or retail generation provider (i.e., took title to the electricity).

YES ☒ NO ☐

If this RPS report also addresses the compliance obligation of an additional CRES Provider, list the company(-ies). Otherwise, indicate N/A.

Note: If the Company indicated zero Ohio retail electric sales in 2016, it need not complete the remainder of this form.

I. Annual RPS Compliance Status Report (refer to Ohio Adm.Code 4901:1-40-05)

Note: Please complete Section I in its entirety and without redaction.

A. Baseline Determination

1. Does the Company propose to use the 3 year average method or compliance year (2016) sales as its baseline? Yes
2. 3 Year Average Calculation (*Note: years with zero sales should be excluded from calculation of average*)

Year	Annual Sales (MWHs)
2013	102,697
2014	282,968
2015	720,158
Three Year Average	368,608



3. Compliance year (2016) sales in MWHs:
4. Source of reported sales volumes: Internal settlements
5. For CRES Providers, if the reported sales volume(s) differs from that in the company's CRES Annual Report(s) filed with the Commission, provide an explanation below for the difference. Otherwise, indicate N/A.

N/A

B. Compliance Obligation for 2016

	Required Quantity	Retired Quantity	Tracking System(s)
Solar	442	442	GATS
Non-Solar	8773	8773	GATS

Note: multiply the proposed baseline by the statutory benchmarks to determine the Required Quantity, with the product rounded to the nearest whole number.

- C. If the Company had a compliance deficiency or compliance excess in a previous year(s) that was rolled forward, describe how that has been incorporated within this filing. Otherwise, indicate N/A.

N/A

- D. Complete and file Staff's compliance worksheet along with filing report.
- E. If the Company is proposing to pay an alternative compliance payment for all or part of its 2016 compliance obligation, enter that amount here: \$ 0.00
Pursuant to Ohio Adm.Code 4901:1-40-08, the obligation is rounded up to the next MWh in the event of a compliance payment.

II. Annual RPS Compliance Planning Report (refer to Ohio Adm.Code [4901:1-40-03\(C\)](#))

A. Projected (non-binding) baseline for the current and future calendar years.

Year	Baseline (MWHs)	Non-Solar Requirement	Solar Requirement
2017			
2018			
2019			
2020			
2021			
2022			
2023			
2024			
2025			
2026			

B. Describe the Company’s supply portfolio projection, including both generation fleet and power purchases, for the 10 year planning horizon.

Forecast is based upon current forecast of contracted sales or expected sales within the territory of OH.

C. Describe the methodology used by the Company to evaluate its compliance options.

Multiplied the preceding 3 year average load served, contracted, or forecasted by the compliance year percentage requirements.

D. Describe any perceived impediments to achieving compliance with the required benchmarks, as well as suggestions for addressing any such impediments.

No comments.

III. RPS Administration

Please describe any suggestions (non-legislative) the Company may have to make the administration of the Ohio RPS more effective and efficient. This could include additional communications, enhancements to the RPS webpage, etc.

N/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	102,697	0	102,697	Settlements	(A)
2014	282,968	0	282,968	Settlements	(B)
2015	720,158	0	720,158	Settlements	(C)

Baseline for 2016 Compliance Obligation (MWHs)

368,608

(D) = AvgABC

(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

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

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	8,773	(G) = (D) * (E)
	Solar RECs Needed for Compliance	442	(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	8,773	(K) = (G) + (I)
	Solar RECs Needed for Compliance	442	(L) = (H) + (J)
	2016 Performance (Per GATS and/or MRETS Data)		
	Non-Solar (RECs)	8,773	(M)
	Solar (S-RECs)	442	(N)
	Under Compliance in 2016, If applicable		
	Non-Solar (RECs)	0	(O) = (K) - (M)
	Solar (S-RECs)	0	(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	\$0.00	(S) = (O) * (Q)
	Solar Total	\$0.00	(T) = (P) * (R)
	TOTAL	\$0.00	(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 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

Liberty Power Corp., LLC - My RPS Compliance - OH - Jan 2016 - Dec 2016

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Delete	Total Generation for Subaccount	OH Solar	OH Renewable	Total Certificates Used for RPS
Liberty Power Corp., LLC	Default	AEP Ohio	321,461			4,143	199	3,944	4,143
Liberty Power Corp., LLC	Default	DAY	38,830			1,239	59	1,180	1,239
Liberty Power Corp., LLC	Default	DEOK	32,589			889	43	846	889
Liberty Power Corp., LLC	Default	FEOH	171,450			2,944	141	2,803	2,944
Total			564,330			9,215	442	8,773	9,215

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/13/2017 10:38:57 AM

in

Case No(s). 17-0988-EL-ACP

Summary: Report Public Version of 2016 Alternative Energy Annual Status Report
electronically filed by Mr. Stephen M Howard on behalf of Liberty Power Holdings, LLC