Confidential Release

Case Number: 11-2469-EL-ACP
Date of Confidential Document: 4/15/2011
Release Date:
Page Count: 5
Document Description: Unredacted version of the Alternative Energy Resources Report for Calendar Year 2010.
"Consent to Release to the PUCO DIS Website"
Name
Reviewing Attorney Examiner's Signature
Date Reviewed SEP 2 1 2017 Date Reviewed This is to certain the images convening the different production of a cape like

CONFIDENTIAL

MIAPRIS PM 2.54

Confidential treatment has been requested for the following document:

Case #	11-2469-ELACP
>	Page Count 5
>	Date Filed 4/15/11
. >	Filed by M. Petricoff on behalf of Disect Energy Busines, LC
*	Summary of document: Alternative Energy Resources Report for Calendar year 2010





Vorys, Sater, Seymour and Pease LLP Legal Counsel RECEIVED-DOCKETING DIV

52 East Gay St. PO Box 1008 Columbus, Ohio 43216-1008

614.464.6400 | www.vorys.com

Founded 1909

2011 APR 15 PM 2:54

PUCO

M. Howard Petricoff
Direct Dial (614) 464-5414
Direct Fax (614) 719-4904
Email mhpetricoff@vorys.com

April 15, 2011

CONFIDENTIAL

Ms. Betty McCauley, Secretary Public Utilities Commission of Ohio 180 E. Broad St., 11th Floor Columbus, Ohio 43215-3793

Re: In the Matter of the Alternative Energy Resources

Report for Calendar Year 2010 From Direct Energy

Business, LLC

Case No. 11-2469-ACP CONFIDENTIAL Version

Dear Ms. McCauley:

Pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, I am submitting under seal three copies of the confidential version of the Alternative Energy Resources Report for Calendar Year 2010 from Direct Energy Business, LLC because it contains confidential and proprietary information. A public version, along with a motion for protective order has also been filed in this matter. Please keep this information confidential until the Commission or the Attorney Examiner can rule on the motion for protective order.

Thank you for your cooperation.

Sincerely,

M. Howard Petricoff

Attorneys for Direct Energy Business, LLC

MHP/jaw Enclosure

Columbus | Washington | Cleveland | Cincinnati | Akron | Houston

COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER ALTERNATIVE ENERGY RESOURCES REPORT FOR CALENDAR YEAR 2010

Direct Energy Business, LLC (name of competitive retail energy service provider) (hereinafter "CRES") in accordance with Sections 4928.64 and 4928.65, Revised Code and Commission Rule 4901:1-40-03 hereby submits this Annual Report detailing compliance with the Ohio Alternative Energy Portfolio Standards.

Altern	Alternative Energy Portfolio Standards.					
I. Determination that an Alternative Energy Resource Report is Required (ch						
	X	During calendar year 2010 the CRES states that it conducted retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.				
		During calendar year 2010 the CRES states that it did not conducted retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio.				
II.	Determ	nination of the sales baseline or sales projection for 2010				
	a.	During the past three calendar years the CRES made retail sales of generation in the amounts shown below				
		2007 <u>368,440</u> MWh				
		2008 <u>380,468</u> MWh				
		2009 410,148 MWh				
	b.	The average annual sales of the active years listed above (sum of the active years' MWh / no. of active years) <u>386,352</u> MWh (hereinafter Baseline Sales)				
	c.	If conditions exist that merit an adjustment to the Baseline Sales please list the adjusted Baseline Sales on this lineNo Adjustment and attach to this AER Report a full explanation of the reason(s) for the adjustment(s).				
	d.	If the CRES was not active during calendar years 2007, 2008 and 2009 but did make sales during calendar years 2010, please project the amount of retail electric generation sales anticipated for the whole of calendar year 2010 as would have been projected on the first day retail generation sales were made in Ohio.				

CONFIDENTIAL

- III. Determination of the number of Required Renewable Energy Credits (RECs)
 - a. CRES has determined that by multiplying the Baseline Sales by 0.49%, the total number of Renewable Energy Credits due for 2010 is 1,893. (line b times 0.49% rounded to the closest whole number)
 - b. CRES has determined that by multiplying the Baseline Sales by 0.01% the number of RECs which must be made up of Solar RECs totals is <u>39</u>. (line b times 0.01% rounded to the closest whole number)
 - i. CRES states that it has applied for a waiver or postponement to obtain instate Solar RECs in 2010.
 - c. CRES states on the date of submission of this Report it had retired the following RECs and Solar RECS in an approved registry as noted below:
 - i. GATS Total RECs 1,912 of which 19 are Solar RECs.
 - ii. M-RETS Total RECs <u>0</u> of which <u>0</u> are Solar RECs.
 - iii. Other approved Registry Total RECs 0 of which 0 are Solar RECs.
 - d. Attached is a screen print of the CRES registry account on or about the date of submission of this report.

IV. Ten Year Forecast

a. Ten Year Forecast of Solar and Non Solar RECs

In accordance with Rule 4901:1-40-03(C) the CRES hereby provides a projection for the next 10 years for RECs and Solar RECs.

Year	Solar	Non-Solar	Total
2010	38	1,866	1,904
2011	114	3,694	3,808
2012	229	5,484	5,713
2013	343	7,274	7,617
2014	457	9,064	9,521
2015	571	12,758	13,329
2016	686	16,452	17,138
2017	838	20,108	20,946
2018	990	23,764	24,754
2019	1,143	27,420	28,563

b. Supply Portfolio projection

CONFIDENTIAL

The CRES intends to purchase all necessary RECs, inclusive of Solar RECs, from suppliers who have received a renewable energy facility certificate from the Public Utilities Commission and are members of an approved REC registry.

c. Methodology used to evaluate compliance

my 4/15/11

Since retail customers are able to choose as their service supplier any CRES supplier, governmental aggregator or utilize a utility standard service offer, the CRES has projected sales to the end of the current Electric Security Plan period for each of the utility service areas in which it conducts sales based on current projections available at the time of submission of this Report. Since the price to compare will change at the end of the Electric Security Plan, projecting the ability to maintain sales let alone increase sales is problematic at best. Thus, after the end of the Electric Security Plan the CRES has assumed the maintenance of the customer base which exists at the end of the plan.

d. Please attach any discussion of any perceived impediments to achieving compliance with the Solar and Non Solar REC requirements, as well as any suggestions for addressing such impediments.

REC market liquidity is the biggest potential impediment that CRES has identified in achieving compliance. A backlog of applications from renewable generators seeking renewable energy certification has hampered the development of an Ohio REC market. The current backlog of applications for certification needs to be cleared so that a market for in-state RECs that currently does not exist can be built.

I, Angela Gregory, am the duly authorized representative of Direct Energy Business, LLC. To the best of my knowledge all the information contained in the foregoing report including any exhibits and attachments are true, accurate and complete.

Signature



Direct Energy Business, LLC - My RPS Compliance - OH - Jan 2010-Dec 2010

al Certificates Used for RPS	1,912	1,912
S2 ClassII Total Certificates Renewable Used for RPS	0	0
Renewable Energy Source	1,893	1,893
olar Renewable Energy Source	19	19
Total Generation for Solar Renewable Subaccount Energy Source	1,912	1,912
Obligation	0	0
Subaccount Name	Reserve Subaccount	Total

Page 1 of 1

NEITHER THE GATS ADMINISTRATOR NOR PJM EIS NOR THE SYSTEM OPERATOR NOR THE PJM EIS GATS PROJECT MANAGER KNOWS OR ENDORSES THE CREDITWORTHINESS OR REPUTATION OF ANY GATS ACCOUNT HOLDER LISTED IN THIS DIRECTORY

CONFIDENTIAL