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BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of Linde Energy Services Inc.)	
Annual Alternative Energy Portfolio Status Report)	
and Plan for Compliance with Future Annual)	Case No. 18-0303-EL-ACP
Advanced and Renewable Energy Benchmarks)	

I. INTRODUCTION

Linde Energy Services Inc. (LESI) is a Competitive Retail Electric Service (CRES) Provider, as defined in Ohio Revised Code §4928.01 (A)(4), and an electric service company as defined within O.R.C. §4928.01(A)(9). LESI is a wholly owned subsidiary of Linde LLC, and is a non-regulated member of the American Electric Power, Inc. system. LESI currently provides electric supply to industrial customers within the state of Ohio.

LESI hereby submits its second Annual Alternative Energy Status Report for the period of January 1, 2017 through December 31, 2017, as required by Ohio Administrative Code Rule 4901:1-40-05 for all electric service companies. As required by the Rule, this Status Report identifies LESI's 2017 energy baseline; demonstrates its compliance with its 2017 renewable and solar energy benchmarks, and outlines its future alternative energy compliance strategy.

II. COMPLIANCE WITH 2015 BENCHMARKS

Under Ohio Rev. Code §4928.64 (B)(2) and Ohio Admin. Code § 4901:1-40-03(A)(2), for the year 2017, electric service companies must demonstrate that 3.35% of the retail electricity they sold was derived from non solar renewable energy resources. In addition, electric service companies must demonstrate that 0.15% of the retail electricity they sold was derived from solar energy resources. 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

LESI however, has chosen to use its 2017 total kilowatt hours sold as its baseline for compliance in 2017. In such a case, Ohio Admin. Code §4928:643 (B) under SB 310 provides:

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.

B. 2017 Renewable and Solar Energy Benchmarks

Using, 185,698 MWH as its 2017 baseline, LESI's calculation of its benchmarks for electricity generated from renewable and solar energy resources for the 2016 is as follows:

TABLE 1
LINDE ENERGY SERVICES INC.
2016 RENEWABLE ENERGY BENCHMARK

Year	Actual Load (MWH)	Non-Solar	Solar
2017	185,698	6221	279

C. Compliance with 2017 Renewable Energy 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).

1. **Non-Solar:** Through the use of brokers and other suppliers, LESI has purchased sufficient RECs to satisfy the non-solar requirement for 2017.
2. **Solar:** Through the use of brokers and other suppliers, LESI purchased sufficient RECs to satisfy its solar requirement for 2017.

A summary of LESI's compliance efforts in 2017 is as follows:

TABLE 2
LINDE ENERGY SERVICES INC.
2017 RENEWABLE ENERGY COMPLIANCE EFFORTS

Year	Actual Load (MWH)	Non-Solar	Solar
2017	185,698	6221	279

D. LESI's Compliance Strategy

LESI's renewable energy compliance strategy for 2017 was to purchase RECs through market brokers. LESI will continue to utilize the broker market to satisfy its compliance obligation.

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

Ohio Administrative Code 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." This plan must contain at least the following four items:

1. Baseline for current and future calendar years.
2. Supply portfolio projection, including both generation fleet and power purchases
3. A description of the methodology used by the company to evaluate its compliance options
4. A discussion of any perceived impediments to achieving compliance with required benchmarks, as well as suggestions for addressing any such impediments.

O.A.C. 4901:1-40-03(C)(1)-(4).

LESI began serving customers in the second quarter of 2012, and continues to grow and establish new customers. Below are current and forecasted sales volumes, along with corresponding REC requirements for the years 2017-2027.

TABLE 3
LINDE ENERGY SERVICES INC.
CURRENT AND TEN YEAR RENEWABLE ENERGY FORECAST

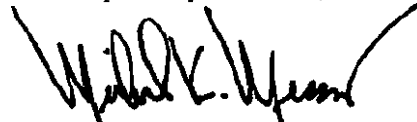
Year	Projected Load (MWH)	Non-Solar,	Solar
2017	185,698	6221	279
2018	185,000	7992	333
2019	185,000	9768	407
2020	185,000	11544	481
2021	185,000	13320	555
2022	185,000	15096	629
2023	185,000	16872	703
2024	185,000	18648	777
2025	185,000	20424	851
2026	185,000	22200	925
2027	185,000	22200	925

As a CRES provider, LESI does not own any electric generation facilities. LESI will continue to supply power to its customers by purchasing power through the wholesale electricity market. LESI will continue to meet its alternative energy benchmarks through the purchasing of RECs and solar RECs, through the use of market brokers and producer contacts. Apart from generalized supply and pricing constraints, LESI does not anticipate significant impediments in acquiring the RECs required to meet its alternative energy benchmarks for future years.

IV. CONCLUSION

Based on the foregoing, LESI respectfully requests that the Commission find that LESI has complied with the applicable renewable energy benchmarks for 2017.

Respectfully submitted,



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