



3050 Post Oak Blvd  
Suite 1330  
Houston, TX 77056

Phone: 800-982-1670  
Fax: 713-583-9087

Via FedEx

April 10, 2018

Public Utilities Commission of Ohio  
180 East Broad Street  
11<sup>th</sup> Floor - PUCO Docketing Division  
Columbus, Ohio 43215  
(614) 466-4095

RE: Case Number: 18-617-EL-ACP - Annual RPS Compliance & Planning Reports  
Freepoint Energy Solutions LLC - 16-1130E approved 10/20/2016

Dear PUCO Docketing Division :

As required by Ohio Administrative Codes 4901:1-40-05 and 4901:1-40-03 (C), Freepoint Energy Solutions LLC ("Freepoint") hereby submits the enclosed reports under Case Number 18-617-EL-ACP:

- Annual RPS Compliance Status Report
- Annual RPS Compliance Planning Report

The information is highly confidential, proprietary, and market-sensitive information. Freepoint is submitting a confidential version, marked "Confidential & Proprietary" and a redacted public version, marked "Public" in accordance with Commission's decision in case no. 12-1233-EL-ACP.

If you have any questions regarding the filing of this Report, please feel free to contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "Mary Atkinson".

Mary Atkinson  
VP, Operations  
(713) 239-8044

RECEIVED-DOCKETING DIV  
2018 APR 12 AM 11:25  
PUCO

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician ↑N Date Processed APR 12 2018



**freepoint**  
energy solutions

3050 Post Oak Blvd  
Suite 1330  
Houston, TX 77056

Phone: 800-982-1670  
Fax: 713-583-9087

State of Texas )

County of Harris )

### VERIFICATION

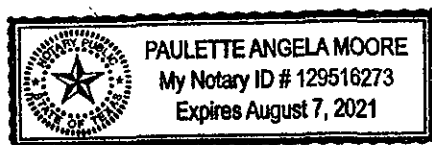
I, Jackson Vo, being first duly sworn, depose and say that I am Freepoint Energy Solutions LLC's President, , that I am knowledgeable of the facts stated therein and that the facts stated therein are true to the best of my knowledge, information and belief. Furthermore, I request Confidential treatment of Freepoint Energy Solutions Annual RPS Compliance Status Report and Annual RPS Compliance Planning Report, pursuant to the Commission's decision in case no. 12-1233-EL-ACP. The retail electricity utilities service industry is highly competitive and it is imperative that public disclosure of confidential information be avoided because of the competitive harm which disclosure of such information would likely cause Freepoint Energy Solutions LLC.

By

**Jackson Vo**

**President**

**SUBSCRIBED** and **SWORN** to before me  
this 10<sup>th</sup> day of April 2018



**Staff's Template RPS Compliance Filing Report  
2017 Compliance Year**

Company Name: Freepoint Energy Solutions LLC  
Case Number (i.e., XX-XXXX-EL-ACP): 18-617-EL-ACP  
Point of Contact for RPS Filing – Name: Mary Atkinson  
Point of Contact for RPS Filing – Email: mnendza@freepointsolutions.com  
Point of Contact for RPS Filing – Phone: 713-239-8044

Did the Company have Ohio retail electric sales in 2017? YES ☒ NO ☐

If a CRES with sales in 2017, 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 2017, 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. **SELECT ONE:** To determine its compliance baseline, is the Company proposing to use (a) the 3 year average method or (b) compliance year (2017) sales?

☐ (a) the 3 year average method      ☒ (b) compliance year (2017) sales

2. **3 Year Average Calculation** (*Note: years with zero sales should be excluded from calculation of average*)

Year	Annual Sales (MWHs)
2014	0
2015	0
2016	0
Three Year Average	0



## Public Utilities Commission

3. Compliance year (2017) sales in MWHs: [REDACTED]
4. Source of reported sales volumes: Billing & Portfolio Management System
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 2017

	Required Quantity	Retired Quantity	Tracking System(s)
Solar	[REDACTED]		
Non-Solar	[REDACTED]		

*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.

We are electing [REDACTED]  
[REDACTED] MWh

- 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 2017 compliance obligation, enter that amount here: \$ 5,521.60  
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.



## Public Utilities Commission

### II. Annual RPS Compliance Planning Report (refer to Ohio Admin. 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
2018	██████████	██████████	██████████
2019	██████████	██████████	██████████
2020	██████████	██████████	██████████
2021	██████████	██████████	██████████
2022	██████████	██████████	██████████
2023	██████████	██████████	██████████
2024	██████████	██████████	██████████
2025	██████████	██████████	██████████
2026	██████████	██████████	██████████
2027	██████████	██████████	██████████

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

The projections are based on most recent data

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

The methodology used was annualizing the most recent average monthly usage for forward years, and applying the stated RPS requirements to those numbers to arrive at Solar/Non-Solar requirement estimates. The expectation is to fulfill requirements via REC's/ACP's.

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

No perceived impediments at this time.

**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. Additional communications, enhancements to the RPS webpage, etc.

**Compliance Plan Status Report for Compliance Year 2017**  
Summary Sheet

	Sales Unadjusted (MWhs)	Proposed Adjustments (MWhs)	Sales Adjusted (MWhs)	Source of Sales Volume Data	
2014			0		(A)
2015			0		(B)
2016			0		(C)

Baseline for 2017 Compliance Obligation (MWhs)

(D) = AvgABC

(Note: If using 2017 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2017 sales are adjusted or not.

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@puco.ohio.gov

3.50%	<b>2017 Statutory Compliance Obligation</b>		
	2017 Non-Solar Renewable Benchmark	3.35%	(E)
	2017 Solar Renewable Benchmark	0.15%	(F)
	Per ORC, 4928.64(B)(2)		
	<b>2017 Compliance Obligation</b>		
	Non-Solar RECs Needed for Compliance		(G) = (D) * (E)
	Solar RECs Needed for Compliance		(H) = (D) * (F)
	<b>Carry-Over from Previous Year(s), if applicable</b>		
	Non-Solar (RECs)		(I)
	Solar (S-RECs)		(J)
	<b>Total 2017 Compliance Obligations</b>		
	Non-Solar RECs Needed for Compliance		(K) = (G) + (I)
	Solar RECs Needed for Compliance		(L) = (H) + (J)
	<b>2017 Retirements (Per GATS and/or MRETS Data)</b>		
	Non-Solar (RECs)		(M)
	Solar (S-RECs)		(N)
	<b>Under Compliance In 2017, if applicable</b>		
	Non-Solar (RECs)		(O) = (K) - (M)
	Solar (S-RECs)		(P) = (L) - (N)
	<b>2017 Alternative Compliance Payments</b>		
	Non-Solar, per REC (Refer to Case 17-0531-EL-ACP)	\$50.24	(Q)
	Solar, per S-REC - per 4928.64(C)(2)(a)	\$250.00	(R)
	<b>2017 Payments, if applicable</b>		
	Non-Solar Total		(S) = (O) * (Q)
	Solar Total		(T) = (P) * (R)
	<b>TOTAL</b>		(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 2017 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@puco.ohio.gov