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April 13, 2018

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

Re: Case No. 18-0671-EL-ACP
Energy Plus Holdings LLC
Public Version of 2017 Alternative Energy Annual Status Report

Dear Ms. McNeal:

I am filing a redacted version of the Alternative Energy Compliance Report for Calendar Year 2017 for Energy Plus Holdings LLC. This report is redacted because it contains certain confidential and proprietary information. Pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, a motion for protective order has been filed and a copy of the confidential version of this report is being submitted under seal.

Thank you for your consideration.

Very truly yours,

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci
Attorneys for Energy Plus Holdings LLC

GLP/jaw
Enclosures

**COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
RENEWABLE PORTFOLIO STATUS (RPS) REPORT FOR CALENDAR YEAR 2017**

Energy Plus Holdings LLC (hereinafter “CRES”) in accordance with Sections 4928.64, 4928.643 and 4928.65, Ohio Revised Code and Commission Rules 4901:1-40-03 and 4901:1-40-05 hereby submits this RPS Report detailing compliance with the Ohio Renewable Portfolio Standards.

Check this box if applicable:

- ☐ This RPS Report also addresses the compliance obligations of an additional CRES provider, _____.

I. Determination that an RPS Report is Required (check one)

- ☒ During calendar year 2017 the CRES states that it conducted retail sales of generation to customers who utilized the generation in a load center located located within the state of Ohio.
- ☐ During calendar year 2017 the CRES states that it did not conduct retail sales of generation to customers who utilized the generation in a load center located within the state of Ohio. (If this block is checked proceed to the signature line)

II. Determination of the sales baseline for 2017

The CRES will mark only one of the applicable options below in the determination of the sales baseline for 2017.

- a. The baseline is computed as an average of the three preceding calendar years (listed below) of the total annual number of MWh of electricity sold to any and all retail electric consumers served by the CRES in Ohio, based upon the MWh sales in the CRES’ most recent quarterly market-monitoring reports or reporting forms. That average is _____ MWh.

2014 _____MWh
2015 _____MWh
2016 _____MWh

- b. The CRES has not been continuously supplying Ohio retail electric customers during the preceding three calendar years; therefore, the baseline shall be computed as an average of annual sales data for all calendar years during the preceding three years (listed below) in which the CRES was serving retail customers. That average of annual sales data for all such calendar years is _____ MWh.

2014 _____MWh
2015 _____MWh
2016 _____MWh

- X** Beginning with compliance year 2014, a CRES may choose for its baseline the total MWh sold during the compliance year to any and all applicable retail consumers located in Ohio who are served by the CRES. Such actual sales in 2017 were **8,004** MWh.
- d. A CRES may file an application requesting a reduced baseline to reflect new economic growth in its service territory or service area. Any such application shall include a justification including why timely compliance based on the unadjusted baseline is not feasible, a schedule for achieving compliance based on its unadjusted baseline, quantification of a new change in the rate of economic growth, and a methodology for measuring economic activity, including objective measurement parameters and quantification methodologies.

III. Determination of the number of Solar and Total Renewable Energy Credits (RECs) Required and Statement of the Number of RECs Claimed

RENEWABLE ENERGY CREDITS REQUIRED AND RETIRED FOR 2017

Types	No. of RECs Required (a)	No. of RECs Retired (b)	Registry (c)
Solar	12	12	PJM GATS
Non Solar	268	268	PJM GATS
Total	280	280	

- a. Column a above lists the unadjusted number of Solar and Total RECs Required for the CRES in 2017. The determinations were calculated by multiplying the Baseline Sales by 15 hundredths of one per cent (.15%) for Solar RECs and 335 hundredths percent (3.35%) for non-Solar RECS. Total RECs include both Solar and Non Solar RECs.
- b. The CRES states that it has retired in accordance with the Commission's Rules the number of Solar and Non Solar RECs listed in column b above for 2017.
- c. The CRES used the PJM GATS and/or M-RETS registry as listed in column (c) for the RECs detailed above.
- d. CRES states that it did not seek and did not receive a *force majeure* determination for Solar RECs.

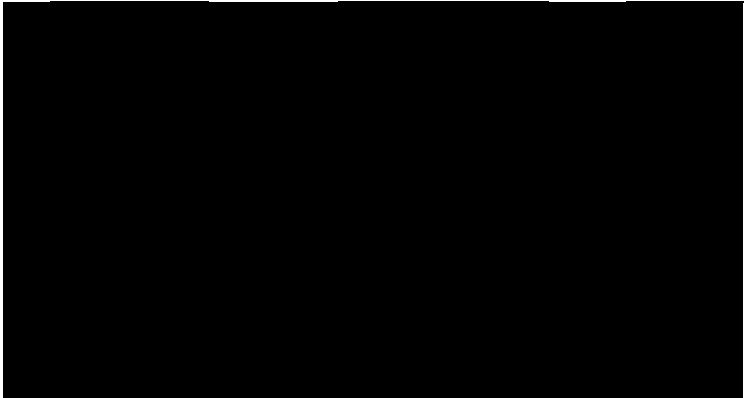
IV. Compliance (check one)

- X** CRES states that it has retired the required number of Solar RECs and Total RECs without adjustments permitted pursuant to Rule 4901:1-40-05(A)(3).
- ☐ CRES states that it has retired the required number of Solar RECs and Total RECs after adjustments permitted pursuant to Rule 4901:1-40-05(A)(3). The type adjustment, reason for the adjustment and merit for making the requested adjustment of the proposed adjustments are detailed in an exhibit attached to this Report.
- ☐ CRES states that it is not in compliance with number of Solar RECs or Total RECs required for 2017.

V. 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 non-binding projection for the next 10 years for RECs and Solar RECs.

<u>Year</u>	<u>Solar RECs</u>	<u>Non-solar RECs</u>	<u>Total RECs</u>
2018			
2019			
2020			
2021			
2022			
2023			
2024			
2025			
2026			
2027			

- b. The Supply Portfolio projection is based upon:
Current customer book with annual attrition and sales assumptions and statutory RPS requirements.
- c. The Methodology used to evaluate its compliance options:
Plan on purchasing RECs and SRECs in lieu of ACP.
- d. Optional comments on any perceived impediment(s) to achieving compliance with the Solar and Non Solar REC requirements, as well as any discussion addressing such impediments.

**COMPETITIVE RETAIL ELECTRIC SERVICE PROVIDER
RENEWABLE PORTFOLIO STATUS (RPS) REPORT FOR CALENDAR YEAR 2017**

I, **Mike Starck**, am the duly authorized representative of Energy Plus Holdings 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

Any questions from the Commission Staff regarding this report should be directed to:

Lindsay Cervenak at **267-295-5843** or
Name Phone Number

lindsay.cervenak@nrg.com
E-Mail Address

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

Sales		Proposed		Sales		Source of	
Unadjusted (MWHs)		Adjustments (MWHs)		Adjusted (MWHs)		Sales Volume Data	
2014		0		0			(A)
2015		0		0			(B)
2016		0		0			(C)
Baseline for 2017 Compliance Obligation (MWHs)				8,004	2017 Sales	(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							
3.50%	2017 Statutory Compliance Obligation						
	2017 Non-Solar Renewable Benchmark			3.35%	(E)		
	2017 Solar Renewable Benchmark			0.15%	(F)		
	Per ORC, 4928.64(B)(2)						
	2017 Compliance Obligation						
	Non-Solar RECs Needed for Compliance			268	(G) = (D) * (E)		
	Solar RECs Needed for Compliance			12	(H) = (D) * (F)		
	Carry-Over from Previous Year(s), if applicable						
	Non-Solar (RECs)			0	(I)		
	Solar (S-RECs)			0	(J)		
	Total 2017 Compliance Obligations						
	Non-Solar RECs Needed for Compliance			268	(K) = (G) + (I)		
	Solar RECs Needed for Compliance			12	(L) = (H) + (J)		
	2017 Retirements (Per GATS and/or MRETS Data)						
	Non-Solar (RECs)			268	(M)		
	Solar (S-RECs)			12	(N)		
	Under Compliance in 2017, if applicable						
	Non-Solar (RECs)			0	(O) = (K) - (M)		
	Solar (S-RECs)			0	(P) = (L) - (N)		
	2017 Alternative Compliance Payments						
	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)		
	2017 Payments, if applicable						
	Non-Solar Total			\$0.00	(S) = (O) * (Q)		
	Solar Total			\$0.00	(T) = (P) * (R)		
	TOTAL			\$0.00	(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@puco.ohio.gov

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

This foregoing document was electronically filed with the Public Utilities

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Case No(s). 18-0671-EL-ACP

Summary: Report Public Version of 2017 Alternative Energy Annual Status Report
electronically filed by Mrs. Gretchen L. Petrucci on behalf of Energy Plus Holdings LLC