



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

Company Name: Hudson Energy Services, LLC

Case Number (i.e., XX-XXXX-EL-ACP): 18-0668-EL-ACP

Point of Contact for RPS Filing – Name: Don Nguyen

Point of Contact for RPS Filing – Email: dnguyen@justenergy.com

Point of Contact for RPS Filing – Phone: 713-933-0782

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.

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	56,460
2015	187,517
2016	389,427
Three Year Average	211,135



## Public Utilities Commission

3. Compliance year (2017) sales in MWHs: 524,590.000
4. Source of reported sales volumes: CRES Annual Report
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	7,073	7,073	PJM GATS
Non-Solar	317	317	PJM GAT

*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 2017 compliance obligation, enter that amount here: \$  
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
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.

Hudson Energy purchases supply based on short-term annual contracts.

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

Just Energy Solutions is not developing and does not own any renewable generation that would qualify under the Ohio RPS program. Instead, Just Energy Solutions purchases renewable energy under third-party contractual agreements to meet its RPS procurement obligations. Just Energy Solutions will purchase renewable energy on an annual basis based on projected sales, hedging against risks with other procurement options. This procurement process will account for the various portfolio content category requirements and will insure that Just Energy Solutions has sufficient procurement from each portfolio content category to satisfy the requirements in accordance with Ohio law (Revised Code Section 4928.64). After the end of each year and each compliance period, Just Energy Solutions will true up its purchases and re-evaluate its retail sales data, to help ensure it will purchase and procure sufficient renewable energy to meet its sales data, to help ensure it will purchase and procure sufficient renewable energy to meet its RPS procurement and portfolio content category requirements.

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



**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.

## Hudson Energy Services, LLC - Subaccount Details - OH - Jan 2017 - Dec 2017

Subaccount Name	Zone Name	Month/Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number	OH Solar	OH Renewable	RPS
Default	AEP Ohio	05/2016	NON67122	Celina Solar Project - Celina Solar Project	OH	SUN	2084658 - 118 to 434	317	12-SPV-OH-GATS-1396	Yes		Yes
Default	AEP Ohio	10/2016	NON41034	Central Utility Plant - CTG2	OH	WH	2471225 - 1 to 4956	4,956	14-WER-OH-GATS-0612		Yes	Yes
Default	AEP Ohio	09/2016	NON41034	Central Utility Plant - CTG2	OH	WH	2410531 - 2998 to 5044	2,047	14-WER-OH-GATS-0612		Yes	Yes
Default	AEP Ohio	10/2016	NON34079	Heat Recovery Coke Facility - TG18	IN	WH	2447927 - 15001 to 15070	70	16-WER-IN-GATS-0188		Yes	Yes
Total								7,390				

Hudson Energy Services, LLC - Subaccount Details - OH - Jan 2017 - Dec 2017

RPS Price	RPS Period	Deposit Date
\$7.75	2017	03/28/2018
\$0.00	2017	03/28/2018
\$0.00	2017	03/28/2018
\$0.00	2017	03/28/2018

**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	56,460	0	56,460	(A)
2015	187,517	0	187,517	(B)
2016	389,427	0	389,427	(C)

**Baseline for 2017 Compliance Obligation (MWHs)**

211,135

(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.*

***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@puco.ohio.gov

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

7,073

(G) = (D) \* (E)

Solar RECs Needed for Compliance

317

(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

7,073

(K) = (G) + (I)

Solar RECs Needed for Compliance

317

(L) = (H) + (J)

**2017 Retirements (Per GATS and/or MRETS Data)**

Non-Solar (RECs)

7,073

(M)

Solar (S-RECs)

317

(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)

*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**

**Commission of Ohio Docketing Information System on**

**4/13/2018 4:12:03 PM**

**in**

**Case No(s). 18-0668-EL-ACP**

Summary: Report Public RPS Compliance Filing Report - 2017 Compliance Year  
electronically filed by Mrs. Gretchen L. Petrucci on behalf of Hudson Energy Services, LLC