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August 22, 2018

VIA ELECTRONIC FILING

Public Utilities Commission of Ohio
Docketing Division, 180 E. Broad Street
Columbus, Ohio 43215

Re: Volunteer Energy Services, Inc.
Case No. 18-0653-EL-ACP

Dear Sir/Madam:

Volunteer Energy Services, Inc., (Volunteer) incorrectly reported it had zero retail electric sales in 2016. It was subsequently discovered this was in error and corrected. Apparently, Volunteer omitted the filing of a corrected 2016 RPS Compliance report as it is not reflected on PUCO's Docketing Information System (DIS). Staff has asked that Volunteer answer the following questions so as to create a regulatory trial:

- 1) Volunteer Energy Services, Inc. (Volunteer) initially filed a CRES annual report indicating zero Ohio retail electric sales for 2016. The Company also did not file an RPS compliance report for 2016, correct?
Volunteer states the preceding question is correct.
- 2) Volunteer identified an error in its 2016 annual report, and has since taken steps to correct it, yes?
Volunteer filed a Request to Amend the 2016 annual report, which was granted by Entry dated May 1, 2018 in Case No. 17-01-AU-RPT and has filed the corrected report.
- 3) Volunteer began serving Ohio retail electric customers in 2016, correct?
Correct.
- 4) Volunteer's 2016 Ohio retail electric sales totaled 2,939 MWHs, correct?
Correct (see attached 2016 RPS compliance report).
- 5) Assuming an RPS compliance baseline comprised of its actual 2016 sales (2,939 MWHs), the Company retired 4 S-RECs and 70 RECs via GATS in April 2018 to address its 2016 RPS obligations, correct?
Correct.

Very truly yours,

VOLUNTEER ENERGY SERVICES, INC.

/s/ John L. Einstein, IV, Esq.

John L. Einstein, IV, Esq.



**Staff's Optional RPS Compliance Filing Report
2016 Compliance Year**

Company Name: Volunteer Energy Services, Inc.

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

Point of Contact for RPS Filing – Name: David Warner

Point of Contact for RPS Filing – Email: dwarner@volunteereenergy.com

Point of Contact for RPS Filing – Phone: 614 729 2319

If CRES, provide Ohio certification number: 15-950E(2)

If CRES, provide certification case number: 15-0375-EL-CRS

Did the Company have Ohio retail electric sales in 2016?

YES ☒ NO ☐

If a CRES with sales in 2016, 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.

NA

Note: If the Company indicated zero Ohio retail electric sales in 2016, 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. Does the Company propose to use the 3 year average method or compliance year (2016) sales as its baseline? 2016 year
2. 3 Year Average Calculation (*Note: years with zero sales should be excluded from calculation of average*)

Year	Annual Sales (MWHs)
2013	
2014	
2015	
Three Year Average	

3. Compliance year (2016) sales in MWHs: 2,939.000
4. Source of reported sales volumes:
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.

2016 MWHs noted above per PJM GATS system.

MWHs differ from due to billing cycle data/revenue recognition policies used for CRES Annual Report while PJM GATS MWHs used for RPS reporting.

B. Compliance Obligation for 2016

	Required Quantity	Retired Quantity	Tracking System(s)
Solar	70	70	PJM GATS
Non-Solar	4	4	PJM GATS

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.**

NA

- 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 2016 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
2017	see 2017 RPS report		
2018			
2019			
2020			
2021			
2022			
2023			
2024			
2025			
2026			

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

see 2017 RPS report

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

see 2017 RPS report

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

NA



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. This could include additional communications, enhancements to the RPS webpage, etc.

Volunteer Energy Services Inc

Compliance Plan Status Report for Compliance Year 2016 Summary Sheet

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data
2013	0	0	0	(A)
2014	0	0	0	(B)
2015	0	0	0	(C)

Baseline for 2016 Compliance Obligation (MWHs)

2,939

(D) = AvgABC

(Note: If using 2016 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2016 sales are adjusted or not.

i.e., Not Adjusted

2.50% 2016 Statutory Compliance Obligation
2016 Non-Solar Renewable Benchmark
2016 Solar Renewable Benchmark
Per R.C., 4928.64(B)(2)

2.38%

(E)

0.12%

(F)

2016 Compliance Obligation

Non-Solar RECs Needed for Compliance
Solar RECs Needed for Compliance

70

(G) = (D) * (E)

4

(H) = (D) * (F)

Carry-Over from Previous Year(s), if applicable

Non-Solar (RECs)
Solar (S-RECs)

0

(I)

0

(J)

Total 2016 Compliance Obligations

Non-Solar RECs Needed for Compliance
Solar RECs Needed for Compliance

70

(K) = (G) + (I)

4

(L) = (H) + (J)

2016 Performance (Per GATS and/or MRETS Data)

Non-Solar (RECs)
Solar (S-RECs)

70

(M)

4

(N)

Under Compliance in 2016, If applicable

Non-Solar (RECs)
Solar (S-RECs)

0

(O) = (K) - (M)

0

(P) = (L) - (N)

2016 Alternative Compliance Payments

Non-Solar, per REC (Refer to Case 16-0714-EL-ACP)
Solar, per S-REC (Refer to R.C. 4928.64(C)(2)(a))

\$49.75

(Q)

\$300.00

(R)

2016 Payments, if applicable

Non-Solar Total
Solar Total
TOTAL

\$0.00

(S) = (O) * (Q)

\$0.00

(T) = (P) * (R)

\$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 2016 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@puc.state.oh.us

Volunteer Energy Services, Inc. - My RPS Compliance - OH - Jan 2016 - Dec 2016

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Total Generation for Subaccount	OH Solar Renewable	Total Certificates Used for RPS
Volunteer Energy Services, Inc.	OH AEP	AEP Ohio	1,924		49	3	49
Volunteer Energy Services, Inc.	OH FE OH	FE OH	1,015		25	1	25
Total			2,939	0	74	4	74

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in

Case No(s). 18-0653-EL-ACP

Summary: Report Relating to 2016 Omitted RPS Compliance Report Filing electronically filed by Mr. John L Einstein IV, Esq. on behalf of Volunteer Energy Services, Inc.