

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2019 Annual)	
Alternative Energy Portfolio Status)	Case No. 20-0827-EL-ACP
Report of Switch Energy, LLC.)	

**SWITCH ENERGY, LLC’S
2019 ANNUAL ALTERNATIVE ENERGY PORTFOLIO STATUS REPORT**

I. INTRODUCTION

Switch Energy, LLC (“Switch”) is a competitive retail service (“CRES”) provider, as defined in Ohio Revised Code § 4928.01(A)(4), and an electric service company, as defined in Rev. Code § 4928.01(A)(9), having been issued Certificate No. 13-686E (4) by the Public Utilities Commission of Ohio (“Commission”). Switch provides electric supply to residential, commercial, mercantile and industrial consumers throughout the state of Ohio.

Pursuant to Rev. Code § 4928.64 and Ohio Administrative Code Rule 4901:1-40-05, all Ohio electric service companies are required to file, by April 15th of each year, an annual alternative energy portfolio status report. In this report, electric service companies are required to analyze “all activities undertaken in the previous calendar year to demonstrate how the applicable alternative energy portfolio benchmarks and planning requirements have or will be met.”

II. ANNUAL ALTERNATIVE ENERGY STATUS REPORT

For calendar year 2019, Rev. Code § 4928.64(B)(2) and Admin. Code 4901:1-40-03(A)(2) require electric service companies to demonstrate that 5.5 percent of the retail electricity sold was derived from renewable energy resources. Additionally, 0.22 percent of the electricity sold by electric service companies must have been generated by solar energy

resources, which portion may also be counted toward the renewable energy resources target. The level of these benchmark requirements is determined by first establishing a baseline number of megawatt hours and then applying the benchmark percentages to that baseline.

A. Baseline Calculation

Under Rule 4901:1-40-03(B)(2)(a), an electric service company's baseline is computed by averaging the number of megawatt hours sold during the three preceding years. As such, Switch computes its baseline as the average of its 2016 through 2018 annual sales data. Calculations for Switch's baseline is provided below.

B. 2019 Renewable and Solar Energy Resource Benchmarks

Based on sales of 32,792 MWh for 2016, and 341,881 MWh for 2017, and 45,395 MWh for 2018, Switch calculated a baseline of 40,023 MWh for 2019. Based on this baseline, Switch's calculation of its benchmarks for electricity generated from renewable and solar energy resources for the year 2019 is as follows:

<u>2019 Baseline</u>	<u>40,023 MWh</u>
Total Renewable and Solar Requirement	2,201 MWh
2019 Renewable Requirement (Total Less Solar)	2,113 MWh
2019 Renewable Requirement (Total Less Non-Solar)	88 MWh

Switch's Compliance Plan Status Report Summary Sheet is attached as Exhibit A.

C. Demonstration of Compliance with 2019 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"). Switch has successfully met its renewable energy benchmarks using RECs. Switch over-complied in 2018 and Staff recommended that Switch apply that over compliance to 2019 and to avoid over-compliance in 2019.¹ Switch fully intended to abide by Staff's recommendation. However,

¹ Pub. Util. Comm. Case No. 19-0917-EL-ACP, Staff Review and Recommendation at p. 4. (Nov. 27, 2019).

through the inadvertent use of a prior RPS compliance percentage Switch again over-complied. Switch respectfully requests that it be allowed to rollover the remaining retired RECs into compliance year 2020 and commits to ensuring the use of the proper compliance percentage in the future.

Switch affirms that it will not seek compliance relief related to its 2019 RPS compliance obligations under the 3% cost provision in R.C. 4928.64(C)(3). Finally, Switch does not perceive any impediments to achieving compliance with required benchmarks.

III. CONCLUSION

Switch respectfully requests that the Commission find that Switch has complied with the applicable renewable energy resource benchmarks for 2019 and its associated reporting requirements.

Respectfully submitted,

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Local Counsel to Switch Energy, LLC

EXHIBIT A

Compliance Plan Status Report for Compliance Year 2019 Summary Sheet

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data
2016	0	0	32,792	(A)
2017	0	0	41,881	(B)
2018	0	0	45,395	(C)

Baseline for 2019 Compliance Obligation (MWHs) 40,023 (D) = AvgABC

(Note: If using 2019 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2019 sales are adjusted or not. i.e., Not Adjusted

5.50% 2019 Statutory Compliance Obligation
2019 Non-Solar Renewable Benchmark 5.28% (E)
2019 Solar Renewable Benchmark 0.22% (F)
Per ORC, 4928.64(B)(2)

2019 Compliance Obligation
Non-Solar RECs Needed for Compliance 2,113 (G) = (D) * (E)
Solar RECs Needed for Compliance 88 (H) = (D) * (F)

Carry-Over from Previous Year(s), if applicable
Non-Solar (RECs) -858 (I)
Solar (S-RECs) -39 (J)

Total 2019 Compliance Obligations
Non-Solar RECs Needed for Compliance 1,255 (K) = (G) + (I)
Solar RECs Needed for Compliance 49 (L) = (H) + (J)

2019 Retirements (Per GATS and/or MRETS Data)
Non-Solar (RECs) 2,054 (M)
Solar (S-RECs) 81 (N)

Under Compliance in 2019, if applicable
Non-Solar (RECs) -799 (O) = (K) - (M)
Solar (S-RECs) -32 (P) = (L) - (N)

2019 Alternative Compliance Payments
Non-Solar, per REC (Refer to Case 19-0742-EL-ACP) \$52.62 (Q)
Solar, per S-REC (Refer to ORC 4928.64(C)(2)(a)) \$200.00 (R)

2019 Payments, if applicable (* See note below)
Non-Solar Total -\$42,043.38 (S) = (O) * (Q)
Solar Total -\$6,400.00 (T) = (P) * (R)
TOTAL -\$48,443.38 (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 **2019** 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. If the Company is proposing to pay an alternative compliance payment, please refer to OAC 4901:1-40-08 regarding the rounding of obligations. Questions concerning this worksheet can be addressed to Stuart.Siegfried@puco.ohio.gov

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Summary: Text 2019 Annual Alternative Energy Status Report electronically filed by Mr. Robert Dove on behalf of Switch Energy, LLC