



An AEP Company

BOUNDLESS ENERGY™

Legal Department

American Electric Power
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Columbus, OH 43215-2373
AEP.com

April 15, 2020

Tanowa Troupe
Docketing Division Chief
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Steven T. Nourse
Vice President - Legal
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Re: *In the Matter of the Annual Alternative Energy Status &
Compliance Report Under Rule 4901:1-40-05, Ohio Admin.
Code, for Ohio Power Company, Case No. 21-431-EL-ACP*

Dear Ms. Troupe:

Ohio Power Company (AEP Ohio) submits its 2020 Annual Compliance Plan Status Report under Rule 4901:1-40-05, Ohio Admin. Code. The enclosed document is the public version of the report. As indicated in the motion for protective order also being filed in this docket, the unredacted version of the report attachment is being filed under seal since it contains confidential information.

Thank you for your attention to this matter.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Steven T. Nourse", written over a horizontal line.

Annual Compliance Plan Status Report

Introduction

In Case No. 08-888-EL-ORD, the Public Utilities Commission of Ohio (“Commission”) approved Rules for the Alternative Energy Portfolio Standard for electric utilities (“Rules”). The Rule became effective on December 10, 2009. Applying Amended Substitute Senate Bill 221 (“S.B. 221”), the Rules require that each electric utility within the jurisdiction of the Commission adhere to specific advanced and renewable energy benchmark percentages. Each electric utility and electric services company is required to file an annual status and compliance report. This report is to be filed by April fifteenth of each year. Per Ohio Administrative Code (“OAC”) 4901:1-40-05(A), the report shall include the following items:

- The annual review will include compliance with the most recent applicable renewable- and solar-energy resource benchmark.
- The annual compliance reviews shall consider any under-compliance an electric utility or electric services company asserts is outside its control.

On June 12, 2014, Governor Kasich signed Substitute Senate Bill 310 (“S.B. 310”) which eliminated the requirement that 50 percent of the renewable energy resources used for compliance with S.B. 221 had to be sourced from renewable energy resources located within the state of Ohio. In addition, the 12.5 percent benchmark achieved through advanced and/or renewable energy resources by 2024 was eliminated.

On July 23, 2019, Governor DeWine signed House Bill 6 (“H.B. 6”) which revised the benchmarks for renewable energy resources beginning in 2020. In addition, H.B. 6 eliminated the requirement for solar energy resources.

Ohio Power Company (“AEP Ohio”) submits this Compliance Plan Status Report for Compliance Year 2020.

AEP Ohio has achieved compliance in meeting the 2020 Benchmark for the Ohio Renewable Portfolio Standard. Although H.B. 6 has eliminated the requirement for solar energy resources beginning in 2020, AEP Ohio is presenting achievement of the Benchmark by separately capturing the contributions of the Non-Solar and Solar Renewables, as shown in the Summary Sheet.

Non-Solar Overview

Non-Solar Renewable contributions were met through two renewable energy purchase agreements with wind as the renewable energy resource and the AEP Ohio customer Renewable Energy Technology program. Additional details around the Non-Solar Renewable contributions are shown in the REC Details Sheet.

Solar Overview

Solar Renewable contributions were met through AEP Ohio facilities, the AEP Ohio customer Renewable Energy Technology program, and a renewable energy purchase agreement. Additional details around the Solar Renewable contributions are shown in the REC Details Sheet.

Adjustments

On April 12, 2021 AEP Ohio filed an application requesting a reduced baseline for economic growth with Case No. 21-352-EL-ACP. That application quantifies the adjustments for economic growth through the associated kWh captured in the Economic Development Rider, which consists of the Reasonable Arrangements with Timken, Eramet, JSW Steel Ohio, Pro-Tec Coatings, Earth N' Wood and Vadata. AEP Ohio has applied these adjustments for economic growth for the 2020 Benchmark, which are stated in the Summary Sheet.

In addition, with S.B. 310, all generation service providers have the option to establish their benchmarks based on the actual retail sales for the compliance year or through the average of the previous three years actual sales. AEP Ohio has opted to use the actual retail sales since the 2015 compliance year and has done so for the 2020 compliance year and plans to continue to do so going forward.

AEP Ohio has a compliance baseline of 9,361,926 MWHs for 2020. The weighted average of the reasonably expected cost of the SSO supply for delivery during the 2020 compliance year, net of distribution losses, is \$46.20/MWH. The reasonably expected total cost is \$525,126,682 and the resulting three percent cost cap is \$15,753,800. The estimated weighted REC (\$/MWH) cost for AEP Ohio in 2020 was \$66.60 which exceeds the three percent calculation. AEP Ohio is not requesting relief from compliance with the renewable energy resource requirements based on the three percent cost cap for compliance year 2020. Also in 2019, H.B. 6 was enacted and includes a provision for bypassable recovery of legacy REPA costs through 2032 and beyond mandatory compliance obligations, R.C. 4928.641.

Conclusion

AEP Ohio is compliant with the 2020 Renewable Portfolio Standard Benchmark based on the actual RECs achieved through Non-Solar and Solar renewable energy resources. As previously recommended in April 2012 by Staff regarding the procedure for retiring AEP Ohio's compliance year RECs, AEP Ohio's 2020 compliance year RECs have been transferred to AEP Ohio's GATS reserve subaccount.

Compliance Plan Status Report for Compliance Year 2020
Summary Sheet

| | Sales Unadjusted (MWHs) | Proposed Adjustments (MWHs) | Sales Adjusted (MWHs) | Source of Sales Volume Data | |
|------|----------------------------|--------------------------------|--------------------------|--------------------------------|-----|
| 2017 | 0 | 0 | 0 | Internal Accounting Data | (A) |
| 2018 | 0 | 0 | 0 | Internal Accounting Data | (B) |
| 2019 | 0 | 0 | 0 | Internal Accounting Data | (C) |

Baseline for 2020 Compliance Obligation (MWHs) 9,361,926 (D) = AvgABC

(Note: If using 2020 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2020 sales are adjusted or not.

Adjusted

| | | | |
|-------|--|---|-----------------|
| 5.50% | 2020 Statutory Compliance Obligation | | |
| | 2020 Total Renewable Benchmark | 5.50% | (E) |
| | Per ORC 4928.64(B)(2) | | |
| | 2020 Compliance Obligation | | |
| | RECs/S-RECs Needed for Compliance | 514,906 | (F) = (D) * (E) |
| | Carry-Over from Previous Year(s), if applicable | | |
| | RECs/S-RECs (Prior Excess) or Prior Deficiency | 0 | (G) |
| | Total 2020 Compliance Obligations | | |
| | RECs/S-RECs Needed for Compliance | 514,906 | (H) = (F) + (G) |
| | 2020 Retirements (Per GATS and/or MRETS Data) | | |
| | RECs/S-RECs | 514,906 | (I) |
| | Under Compliance in 2020, if applicable | | |
| | RECs/S-RECs | 0 | (J) = (H) - (I) |
| | 2020 Alternative Compliance Payments | | |
| | Per REC (Case 20-0163-EL-ACP) | \$53.49 | (K) |
| | 2020 Payments, if applicable (* See note below) | | |
| | Total | \$0.00 | (L) = (J) * (K) |

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 **2020** 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

AEP Ohio Compliance Plan Status Report for 2020
REC Details Sheet

1. **NON-SOLAR** Renewable Energy Credits

| Month/Year | State | Facility Name | Certificate Serial Numbers | Quantity OH State Number | Reserved |
|------------------|---|---------------|----------------------------|--------------------------|----------|
| 1/1/2020 | OH | | | | Yes |
| 2/1/2020 | OH | | | | Yes |
| 3/1/2020 | OH | | | | Yes |
| 4/1/2020 | OH | | | | Yes |
| 5/1/2020 | OH | | | | Yes |
| 9/1/2020 | OH | | | | Yes |
| 11/1/2020 | OH | | | | Yes |
| 12/1/2020 | OH | | | | Yes |
| 3/1/2017 | IN | | | | Yes |
| 4/1/2017 | IN | | | | Yes |
| 5/1/2017 | IN | | | | Yes |
| 6/1/2017 | IN | | | | Yes |
| 7/1/2017 | IN | | | | Yes |
| 8/1/2017 | IN | | | | Yes |
| 9/1/2017 | IN | | | | Yes |
| 10/1/2017 | IN | | | | Yes |
| 11/1/2017 | IN | | | | Yes |
| 12/1/2017 | IN | | | | Yes |
| 3/1/2017 | IN | | | | Yes |
| 4/1/2017 | IN | | | | Yes |
| 5/1/2017 | IN | | | | Yes |
| 6/1/2017 | IN | | | | Yes |
| 7/1/2017 | IN | | | | Yes |
| 8/1/2017 | IN | | | | Yes |
| 9/1/2017 | IN | | | | Yes |
| 10/1/2017 | IN | | | | Yes |
| 11/1/2017 | IN | | | | Yes |
| 12/1/2017 | IN | | | | Yes |
| 3/1/2017 | OH | | | | Yes |
| 4/1/2017 | OH | | | | Yes |
| 5/1/2017 | OH | | | | Yes |
| 6/1/2017 | OH | | | | Yes |
| 7/1/2017 | OH | | | | Yes |
| 8/1/2017 | OH | | | | Yes |
| 9/1/2017 | OH | | | | Yes |
| 10/1/2017 | OH | | | | Yes |
| 11/1/2017 | OH | | | | Yes |
| 12/1/2017 | OH | | | | Yes |
| 1/1/2018 | OH | | | | Yes |
| Sub-Total | Ohio Non-Solar Renewable Energy Credits | | | 494,310 | |

2. **SOLAR** Renewable Energy Credits

| Month/Year | State | Facility Name | Certificate Serial Numbers | Quantity OH | State Number | Reserved |
|------------|-------|---------------|----------------------------|-------------|--------------|----------|
| 3/1/2020 | OH | | | | | Yes |
| 5/1/2020 | OH | | | | | Yes |
| 7/1/2020 | OH | | | | | Yes |
| 8/1/2020 | OH | | | | | Yes |
| 10/1/2020 | OH | | | | | Yes |
| 2/1/2020 | OH | | | | | Yes |
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| 4/1/2020 | OH | | | | | Yes |
| 5/1/2020 | OH | | | | | Yes |
| 6/1/2020 | OH | | | | | Yes |
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| 5/1/2020 | OH | | | | | Yes |
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| 3/1/2020 | OH | | | | | Yes |
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| 9/1/2018 | OH | | Yes | |
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| 11/1/2018 | OH | | Yes | |
| 12/1/2018 | OH | | Yes | |
| 1/1/2019 | OH | | Yes | |
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| 3/1/2020 | OH | | Yes | |
| 4/1/2020 | OH | | Yes | |
| 5/1/2020 | OH | | Yes | |
| Sub-Total | Ohio Solar Renewable Energy Credits | | 20,596 | |
| TOTAL Ohio Renewable Energy Credits 514,906 | | | | |
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/15/2021 9:23:06 AM

in

Case No(s). 21-0431-EL-ACP

Summary: Report - Ohio Power Company Submits Its 2020 Annual Compliance Plan Status
Report electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company