



Staff's Template RPS Compliance Filing Report
2021 Compliance Year

Company Name: Public Power, LLC
Case Number (i.e., XX-XXXX-EL-ACP): 22-0428-EL-ACP
Point of Contact for RPS Filing – Name: David Proaño
Point of Contact for RPS Filing – Email: dproano@bakerlaw.com
Point of Contact for RPS Filing – Phone: 216-861-7834

Did the Company have Ohio retail electric sales in 2021? YES ☒ NO ☐

If a CRES with sales in 2021, 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 2021, it need not complete the remainder of this form.

Annual RPS Compliance Status Report (refer to Ohio Adm.Code [4901:1-40-05](#))

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 (2021) sales? ☒ (a) 3-year average ☐ (b) compliance year sales

2. 3 Year Average Calculation *(Note: years with zero sales should be excluded from calculation of average)*

Year	Annual Sales (MWHs)
2018	156,345
2019	174,660
2020	138,966
Three Year Average	156,657

3. Compliance year (2021) sales in MWHs: _____

REMINDER TO CRES PROVIDERS: Unless you are requesting a baseline reduction as a result of having served a registered self-assessing purchaser, the annual sales volumes listed in the RPS report should match the annual sales volumes reported by the Company in its Annual Report for Fiscal Assessment. Refer to [OAC 4901:1-40-03\(B\)\(2\)\(c\)](#).

4. Does the Company's proposed baseline incorporate reductions to its annual sales volume(s) as a result of serving registered self-assessing purchasers? (Refer to [ORC 4928.644](#))

☐

YES

☒

NO

B. Compliance Obligation for 2021

	Required Quantity	Retired Quantity	Tracking System(s)
Renewable	9,399	9,399	PJM-GATS

Note: multiply the proposed baseline by the statutory benchmark 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 2021 compliance obligation, enter that amount here: \$0.00
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.

- F. Is the Company seeking compliance relief related to its 2021 RPS compliance obligations under the 3% cost provision in ORC [4928.64\(C\)\(3\)](#)? Indicate Yes or No. ☐ Yes ☒ No

If “No” and a CRES Provider, proceed to Question G. If “Yes” and/or an EDU, indicate the Company’s percent status using the calculation methodology detailed in Ohio Adm.Code [4901:1-40-07\(B\)](#). 0.00%

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

N/A

- H. RPS Administration: Please describe any non-legislative suggestions the Company may have to make the administration of the Ohio RPS more effective and efficient. Additional communications, enhancements to the [RPS webpage](#), etc.

N/A

Public Power, LLC
Compliance Plan Status Report for Compliance Year 2021
Summary Sheet

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data	
2018	156,345	0	156,345		(A)
2019	174,660	0	174,660		(B)
2020	138,966	0	138,966		(C)
Baseline for 2021 Compliance Obligation (MWHs)			156,657		(D) = AvgABC
(Note: If using 2021 sales as your baseline, insert that figure in cell I14 and indicate in cell K16 if 2021 sales are adjusted or not.					i.e., Not Adjusted
6.00%	2020 Statutory Compliance Obligation				
	2021 Non-Solar Renewable Benchmark				(E)
	2021 Solar Renewable Benchmark				(F)
	Per ORC, 4928.64(B)(2)				
	2021 Compliance Obligation				
	Non-Solar RECs Needed for Compliance				(G) = (D) * (E)
	Solar RECs Needed for Compliance				(H) = (D) * (F)
	Carry-Over from Previous Year(s), if applicable				
	Non-Solar (RECs)				(I)
	Solar (S-RECs)				(J)
	Total 2021 Compliance Obligations				
	Non-Solar RECs Needed for Compliance				(K) = (G) + (I)
	Solar RECs Needed for Compliance				(L) = (H) + (J)
	2021 Retirements (Per GATS and/or MRETS Data)				
	Non-Solar (RECs)				(M)
	Solar (S-RECs)				(N)
	Under Compliance in 2021, if applicable				
	Non-Solar (RECs)				(O) = (K) - (M)
	Solar (S-RECs)				(P) = (L) - (N)
	2021 Alternative Compliance Payments				
	Non-Solar, per REC (Refer to Case 19-0742-EL-ACP)				(Q)
	Solar, per S-REC (Refer to ORC 4928.64(C)(2)(a))				(R)
	2021 Payments, if applicable (* See note below)				
	Non-Solar Total				(S) = (O) * (Q)
	Solar Total				(T) = (P) * (R)
	TOTAL				(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 **2021** 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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Case No(s). 22-0428-EL-ACP

Summary: Report for the 2021 RPS Compliance Year of Public Power, LLC
electronically filed by Mr. David F. Proano on behalf of Public Power, LLC