

January 6th, 2023

Secretary, Public Utilities Commission of Ohio
180 E. Broad Street, 11th Floor
Columbus, Ohio 43215-3793

RE: In the matter of the Annual Alternative Energy Resources Compliance
Report for Calendar Year 2021 and forward looking compliance planning
Document for American PowerNet Management, LP

Case No. 22 0393 ELACP

Dear Sir/Madam:

Enclosed please find the Adjusted Alternative Energy Resources Compliance Report (4901:1-40-05) for calendar year 2021 as well as the forward-looking compliance planning document (4901:1-40-03(C) for American PowerNet Management, LP. This adjustment and resubmission is due to an error found in our previous submission.

Should you have any questions, please do not hesitate to contact me at (610) 372-8500 or via email at vguntle@americanpowernet.com.

Sincerely

A handwritten signature in black ink that reads "Vince Guntle". The signature is written in a cursive, flowing style.

Vince Guntle

Vice President, Markets and Operations



Staff's Template RPS Compliance Filing Report
2021 Compliance Year

Company Name: _____

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

Point of Contact for RPS Filing – Name: _____

Point of Contact for RPS Filing – Email: _____

Point of Contact for RPS Filing – Phone: _____

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. _____

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	
2019	
2020	
Three Year Average	

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			

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.

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: \$_____ 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\(B\)](#). _____

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

- 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.

**RPS Compliance Status Report for Compliance Year 2021
Summary Sheet**

	Sales Unadjusted (MWHs)	Proposed Adjustments (MWHs)	Sales Adjusted (MWHs)	Source of Sales Volume Data*	
2018	115,011	0	115,011	GAT's	(A)
2019	77,030	0	77,030	GAT's	(B)
2020	205,052	0	205,052	GAT's	(C)
Baseline for 2021 Compliance Obligation (MWHs)			260,647		(D) = AvgABC
<i>(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>					Not adjusted
6.00%	2021 Statutory Compliance Obligation				
	2021 Total Renewable Benchmark		6.00%		(E)
	Per ORC 4928.64(B)(2)				
	2021 Compliance Obligation				
	RECs/S-RECs Needed for Compliance		15,639		(F) = (D) * (E)
	Carry-Over from Previous Year(s), if applicable				
	RECs/S-RECs (Prior Excess) or Prior Deficiency		0		(G)
	Total 2021 Compliance Obligations				
	RECs/S-RECs Needed for Compliance		15,639		(H) = (F) + (G)
	2021 Retirements (Per GATS and/or MRETS Data)				
	RECs/S-RECs		15,639		(I)
	Under Compliance in 2021, if applicable				
	RECs/S-RECs		0		(J) = (H) - (I)
	2021 Alternative Compliance Payments				
	Per REC (Case 21-0592-EL-ACP)		\$54.14		(K)
	2021 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 **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 Kristin.DuPree@puco.ohio.gov

**Competitive Retail Electric Service Provider Alternative Energy Resource
Compliance Report for Calendar Year 2021 of
American PowerNet Management, LP**

I, David R. Butsack am the duly authorized representative of American PowerNet Management, LP and state to the best of my knowledge and ability, all the information contained in the foregoing Competitive Retail Electric Service Provider Alternative Energy Resource Compliance Report for Calendar Year 2021, including any exhibits and attachments are true, accurate and complete.



David R. Butsack
Vice President
American PowerNet Management, LP

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Total Generation for Subaccount	OH Solar	OH Renewable	Total Certificates Used for RPS
American PowerNet Management, L.P.	Default	AEP Ohio	23,275	11,646	1,377	0	1,377	1,377
American PowerNet Management, L.P.	Default	DAY	35,425	17,725	2,090	0	2,090	2,090
American PowerNet Management, L.P.	Default	DEOK	144,951	72,528	8,570	25	8,545	8,570
American PowerNet Management, L.P.	Default	FEOH	60,886	30,465	3,602	0	3,602	3,602
Total			264,537	132,364	15,639	25	15,614	15,639

American PowerNet Management, L.P. - My RPS Compliance - OH - Jan 2021 - Dec 2021

Account Name	Subaccount Name	Zone Name	GATS Load	RPS Load	Total Generation for Subaccount	OH Solar	OH Renewable	Total Certificates Used for RPS
American PowerNet Management, L.P.	Default	AEP Ohio	23,275	11,646	1,377	0	1,377	1,377
American PowerNet Management, L.P.	Default	DAY	35,425	17,725	2,090	0	2,090	2,090
American PowerNet Management, L.P.	Default	DEOK	144,951	72,528	8,570	25	8,545	8,570
American PowerNet Management, L.P.	Default	FEOH	60,886	30,465	3,602	0	3,602	3,602
Total			264,537	132,364	15,639	25	15,614	15,639

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	RPS Price	RPS Period	Deposit Date
Default	AEP Ohio	1/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 13811 to 14294	484	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	AEP Ohio	12/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10892323 - 12277 to 12843	567	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	AEP Ohio	12/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10892323 - 16150 to 16260	111	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	AEP Ohio	7/1/2020	NON237013	Big Turtle Wind Farm, LLC - Big Turtle Wind Farm Two	MI	WND	8407056 - 1122 to 1336	215	18-WND-MI-GATS-0511		Yes	Yes	\$10.20	2021	4/14/2022
Default	DAY	1/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 14295 to 14868	574	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	DAY	1/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 14869 to 15358	490	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	DAY	9/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10407547 - 13143 to 14168	1,026	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	DEOK	5/1/2019	NON230476	Becks Hybrids Inc - Becks Hybrids North MegaWatt	IN	SUN	5852564 - 10 to 34	25	18-SPV-IN-GATS-0370	Yes		Yes	\$10.20	2021	4/14/2022
Default	DEOK	1/1/2021	MSET89962901	AEP JAY COUNTY 1 LF - 1	IN	LFG	8923955 - 71 to 1826	1,756	09-BIO-IN-GATS-0015		Yes	Yes	\$10.20	2021	4/14/2022
Default	DEOK	2/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9053949 - 10756 to 11545	790	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	DEOK	2/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9053949 - 11546 to 12055	510	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	DEOK	1/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 15359 to 16279	921	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	DEOK	1/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 4055 to 4404	350	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	DEOK	7/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10032051 - 17055 to 17508	454	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	DEOK	8/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10184182 - 14925 to 17152	2,228	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	DEOK	9/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10407547 - 14169 to 14846	678	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	DEOK	9/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10407547 - 15799 to 16322	524	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	DEOK	12/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10892323 - 11943 to 12276	334	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	FEOH	2/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9053949 - 12056 to 12598	543	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	FEOH	2/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9053949 - 3218 to 3567	350	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	FEOH	3/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9258363 - 2635 to 2984	350	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	FEOH	3/1/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9258363 - 8625 to 9209	585	15-ROR-OH-GATS-0107		Yes	Yes	\$10.20	2021	4/14/2022
Default	FEOH	7/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10032051 - 12619 to 13508	890	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	FEOH	7/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10032051 - 15142 to 15508	367	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Default	FEOH	7/1/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10032051 - 16538 to 17054	517	16-HYD-KY-GATS-0187		Yes	Yes	\$6.25	2021	1/6/2023
Total								15,639							

American PowerNet Management, L.P. - Subaccount Details - OH - Jan 2021 - Dec 2021

Subaccount Name	Zone Name	Month/ Year	Unit ID	Facility Name	State	Fuel Type	Certificate Serial Numbers	Quantity	State Certification Number
Default	AEP Ohio	01/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 13811 to 14294	484	15-ROR-OH-GATS-0107
Default	AEP Ohio	12/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10892323 - 12277 to 12843	567	16-HYD-KY-GATS-0187
Default	AEP Ohio	12/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10892323 - 16150 to 16260	111	16-HYD-KY-GATS-0187
Default	AEP Ohio	07/01/2020	NON237013	Big Turtle Wind Farm, LLC - Big Turtle Wind Farm Two	MI	WND	8407056 - 1122 to 1336	215	18-WND-MI-GATS-0511
Default	DAY	01/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 14295 to 14868	574	15-ROR-OH-GATS-0107
Default	DAY	01/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 14869 to 15358	490	15-ROR-OH-GATS-0107
Default	DAY	09/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10407547 - 13143 to 14168	1,026	16-HYD-KY-GATS-0187
Default	DEOK	05/01/2019	NON230476	Becks Hybrids Inc - Becks Hybrids North MegaWatt	IN	SUN	5852564 - 10 to 34	25	18-SPV-IN-GATS-0370
Default	DEOK	01/01/2021	MSET89962901	AEP JAY COUNTY 1 LF - 1	IN	LFG	8923955 - 71 to 1826	1,756	09-BIO-IN-GATS-0015
Default	DEOK	02/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9053949 - 10756 to 11545	790	15-ROR-OH-GATS-0107
Default	DEOK	02/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9053949 - 11546 to 12055	510	15-ROR-OH-GATS-0107
Default	DEOK	01/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 15359 to 16279	921	15-ROR-OH-GATS-0107
Default	DEOK	01/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	8922314 - 4055 to 4404	350	15-ROR-OH-GATS-0107
Default	DEOK	07/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10032051 - 17055 to 17508	454	16-HYD-KY-GATS-0187
Default	DEOK	08/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10184182 - 14925 to 17152	2,228	16-HYD-KY-GATS-0187
Default	DEOK	09/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10407547 - 14169 to 14846	678	16-HYD-KY-GATS-0187
Default	DEOK	09/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10407547 - 15799 to 16322	524	16-HYD-KY-GATS-0187
Default	DEOK	12/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10892323 - 11943 to 12276	334	16-HYD-KY-GATS-0187
Default	FEOH	02/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9053949 - 12056 to 12598	543	15-ROR-OH-GATS-0107
Default	FEOH	02/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9053949 - 3218 to 3567	350	15-ROR-OH-GATS-0107
Default	FEOH	03/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9258363 - 2635 to 2984	350	15-ROR-OH-GATS-0107
Default	FEOH	03/01/2021	MSET89560101	EKPC GREENUP 1-3H - 1	OH	WAT	9258363 - 8625 to 9209	585	15-ROR-OH-GATS-0107
Default	FEOH	07/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10032051 - 12619 to 13508	890	16-HYD-KY-GATS-0187
Default	FEOH	07/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10032051 - 15142 to 15508	367	16-HYD-KY-GATS-0187
Default	FEOH	07/01/2021	NON116031	CANNELTON HYDROELECTRIC PLANT - 1	KY	WAT	10032051 - 16538 to 17054	517	16-HYD-KY-GATS-0187
Total								15,639	

American PowerNet Management, L.P. - Subaccount Details - OH - Jan 2021 - Dec 2021

OH Solar	OH Renewable	RPS	RPS Price	RPS Period	Deposit Date
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$6.25	2021	01/06/2023
	Yes	Yes	\$6.25	2021	01/06/2023
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$6.25	2021	01/06/2023
Yes		Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$6.25	2021	01/06/2023
	Yes	Yes	\$6.25	2021	01/06/2023
	Yes	Yes	\$6.25	2021	01/06/2023
	Yes	Yes	\$6.25	2021	01/06/2023
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$10.20	2021	04/14/2022
	Yes	Yes	\$6.25	2021	01/06/2023
	Yes	Yes	\$6.25	2021	01/06/2023
	Yes	Yes	\$6.25	2021	01/06/2023

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

1/27/2023 9:18:45 AM

in

Case No(s). 22-0393-EL-ACP

Summary: Report Amended 2021 RPS filing electronically filed by Mr. Vincent
Guntle on behalf of American PowerNet Management LP and Vincent Guntle