

2000 West Loop South, Ste. 2010 Houston, TX 77027

April 21, 2020

Commission Secretary Public Service Commission of the District of Columbia 1325 G Street, NW, Suite 800 Washington, D.C. 20005

RE: LifeEnergy, LLC's – Electricity Supplier Annual Compliance Report – District of Columbia Renewable Portfolio Standard (REPS) Program

Dear Commission Secretary,

LifeEnergy, LLC respectfully submits its Renewable Portfolio Standard Report. Please find enclosed one signed and verified original and an electronic version of the annual report and attachments.

Should you have any questions or need additional information, please do not hesitate to contact me at 281-813-3434 or sbrownell@lifeenergy.com.

Sincerely,

## Stephen J. Brownell

Stephen J. Brownell Counsel for LifeEnergy, LLC Texas Bar No. Name of Electricity Supplier: LifeEnergy, LLC Address: c/o LS Power Equity Partners, LLC

1700 Broadway, 35<sup>th</sup> Floor New York, NY 10019

Point of Contact: John Staikos

Title: SVP and General Counsel

Address:

1700 Broadway, 35<sup>th</sup> Floor New York, NY 10019

Phone: 212-615-3441 Fax: 212-614-3440

E-mail: jstaikos@lspower.com

Reporting Period: From: 01/01/2019 To: 12/31.2019

## Electricity Supplier Annual Compliance Report – District of Columbia REPS Program

#### ATTESTATION OF GENERAL COMPLIANCE

I, Attestor, hereby attest to the Public Service Commission of the District of Columbia under penalty of perjury that:

The Officer/Attestor has personally examined and is familiar with all information contained in the annual compliance report, including any attachments and appendices, and further certifies the information to be true, correct, complete, and in compliance with Title 15, Section 2901.5 of the D.C. Municipal Regulations.

The Electricity Supplier submitting the annual compliance report has applied the standard required, pursuant to D.C. Official Code § 34-1432(c) and § 34-1432(e), for each electricity product sold at retail.

Stephen J. Brownell
Attorney for LifeEnergy, LLC

Date: April 21, 2020

## **Electricity Supplier Annual Compliance Report – District of Columbia REPS Program**

## **Required Documentation:**

- Confirmation that all Solar, Tier I, and Tier II RECs from PJM-EIS GATS, including the District certification number that were retired during the reporting period and the price paid for each Solar, Tier I, and Tier II REC, are available in the GATS reporting system;
- Certification of the accuracy and veracity of the report Certification of General Compliance;
- Compliance Fee Report; and
- Documentation to support other data in the report.

Under penalty of perjury, the undersigned hereby affirms that he/she is authorized to and hereby does submit this Report for the Electricity Supplier and that based upon personal knowledge and information the contents of this Report are true.

Stephen J. Brownell 04 21.2020 Date

Stephen J. Brownell – Legal Counsel\_\_\_\_\_ Print Name and Title

# Electricity Supplier Annual Compliance Report - DC RPS Program Compliance Year 2019

Electricity Supplier: LifeEnergy, LLC
Point of Contact: Stephen J. Brownell

Title: Counsel

Address: 1926 Stanford Park Ct

Katy, Texas

Phone: 281-813-3434

E-mail: attorneybrownell@gmail.com

Fax: NA

#### **Compliance Fee Report:**

The calculations below reflect the prior solar REC pricing under the DGAA of 2011 and only apply to the compliance years prior to 2022.

Solar		
Solar RECs Used for Compliance		Block 5
Percentage of Retail Sales		Block 6
Solar Energy Compliance Amount	0	Block 7 = Block 2 (Sales Tab) * Block 6
Shortfall of Solar RECs	0	Block 8
Solar REC Compliance Fee Rate	\$200	\$/MWH
Solar Energy Compliance Fee	\$0.00	Block 9

The calculations below reflect the new solar REC pricing under the CleanEnergy DC Omnibus Amendment Act of 2018.

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Solar		
Solar RECs Used for Compliance	73	Block 10
Percentage of Retail Sales	100.00%	Block 11 = 100% - Block 6
Solar Energy Compliance Amount	65	Block 12 = Block 2 (Sales Tab) - Block 7
Shortfall of Solar RECs	0	Block 13
Solar REC Compliance Fee Rate	\$500	\$/MWH
Solar Energy Compliance Fee	\$0.00	Block 1/

## Solar RECs submitted above, in Blocks 5 and 10, should be included in the count toward meeting the Tier I REC requirements.

Tier I		
Tier I RECs Used for Compliance (including Solar RECs)	844	Block 15
Tier I Compliance Amount	843	Block 16
Shortfall of Tier I RECs	0	Block 17
Tier I Compliance Fee Rate	\$50	\$/MWH
Tier I Compliance Fee	\$0.00	Block 18

Tier II		
Tier I or Tier II RECs Used for Compliance (MSW disallowed)	25	Block 19
Tier II Compliance Amount	24	Block 20
Shortfall of Tier II RECs	0	Block 21
Tier II Compliance Fee Rate	\$10	\$/MWH
Tier II Compliance Fee	\$0.00	Block 22
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Total Compliance Fee Due	\$0.00	Block 23

Enter the supplier contact information in the yellow highlighted area above. In addition, this worksheet only requires entries for Blocks 5, 6, 10, 15, and 19. The other sections will be calculated based on the entries.

Block 5 Enter the number of Solar RECs retired for the grandfathered portion of retail sales.

Block 6 Enter the percentage of retail sales, pursuant to the RPS Expansion Amendment Act of 2016 (DC Law 21-154),

which allows energy supply contracts entered into prior to October 8, 2016 to be grandfathered for up to 5 years.

Block 7 Grandfathered portion of the solar energy requirement per Block 6.

Block 8 Shortfall amount for grandfathered Solar REC compliance

**Block 9** Block 9 = Block 8 \* (\$350 in 2017, \$300 in 2018, \$200 in 2019 and 2020, and \$150 in 2021.

Block 9 is based on grandfathered compliance fee rates from the DGAA of 2011.

Block 10 Enter the number of Solar RECs retired for the non-grandfathered portion of retail sales.

Block 11 Percentage of retail sales that are not grandfathered, pursuant to the RPS Expansion Amendment Act of 2016.

Block 12 Remaining portion of non-grandfathered solar energy requirement.

Block 13 Shortfall amount for non-grandfathered Solar REC compliance

Block 14 = Block 13 \* (\$500 in 2016 through 2023, \$400 in 2024 through 2028, \$300 in 2029 through 2032,

and \$50 in 2033 and thereafter)

Block 15 Enter the total number of Tier I RECs retired, including the number of solar RECs retired.

Block 15 counts all the solar RECs retired with all other retired Tier I RECs toward the Tier I requirement.

Block 16	This	s figure is c	arrie	d ove	er from	Block 3	(Sales	Tab	)
	<b>~</b> :								

Block 17 Shortfall amount for Tier I REC compliance, Block 17 = Block 16 - Block 15

Compliance Fee Due for the Tier I Obligation.

**Block 18** Block 18 = Block 17 \* \$50

Block 19 Enter the total number of Tier I or Tier II RECs retired. MSW RECs are no longer accepted.

Block 20 This figure is carried over from Block 4 (Sales Tab)

Block 21 Shortfall amount for Tier II REC compliance, Block 21 = Block 20 - Block 19

Compliance Fee Due for the Tier II Obligation

**Block 22** Block 22 = Block 21 \* \$10

Block 23 Total Compliance Fee Due: Block 18=Block 9 + Block 14 + Block 18 + Block 22.

## Please provide the following additional information:

Number of energy supply contracts associated with Block 1b; Average length (in years) of such contracts associated with Block 1b; Estimate of retail sales (subject to Block 1b) in compliance year 2020; Estimate of retail sales (subject to Block 1b) in compliance year 2021; Number of energy supply contracts associated with Block 6; Average length (in years) of such contracts associated with Block 6; Estimate of retail sales (subject to Block 6) in compliance year 2020; Estimate of total retail sales in compliance year 2020; Estimate of total retail sales in compliance year 2021;

Estimate of the total compliance fees to be paid in 2020;

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Please attach, as appropriate, separate sheet(s) showing the length and the amount of electricity sold for each energy supply contract associated with Blocks 1b and 6;