



3050 Post Oak Blvd., Suite 1330  
Houston, TX 77056

Phone: 713 239 8000

Via Electronic Filing

CONFIDENTIAL

May 4, 2020

Office of the Commission Secretary  
Public Service Commission of the District of Columbia  
1325 G Street NW, Suite 800  
Washington, D.C. 20005  
Tel: (202) 626-0558

RE: **Code D.C.M.R. 15-2901.6 Annual REPS Compliance Report**  
Freepoint Energy Solutions LLC - Order 18711 approved 03/01/2017

Dear Secretary:

As required by Code D.C.M.R 15-2901.6, Freepoint Energy Solutions LLC ("Freepoint") hereby submits the enclosed and updated Annual Compliance Report regarding the District of Columbia Renewable Energy Portfolio Standard (REPS) Program.

Due to the COVID-19 Emergency Freepoint does not have access to its standard information and equipment. As a result, the required payment will be sent no later than November 1, 2020.

If you have any questions regarding the filing of this report, please feel free to contact me.

Respectfully submitted,

/s/ Mary Nendza Atkinson  
Mary Nendza Atkinson  
VP, Operations  
mnendza@freepointsolutions.com  
(713) 239-8044

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

Name of Electricity Supplier: Freepoint Energy Solutions LLC

Address: 3050 Post Oak Blvd  
Suite 1330  
Houston, Texas 77056

Point of Contact: Mary Nendza Atkinson

Title: VP of Operations

Address: 3050 Post Oak Blvd  
Suite 1330  
Houston, Texas 77056

Phone: 713-239-8044

Fax: 713-583-9087

E-mail: [mnendza@freepointsolutions.com](mailto:mnendza@freepointsolutions.com)

Reporting Period: From: 01/01/2019 To: 12/31/2019

**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, is available in the GATS reporting system;
- Proof of payment of any compliance fee due (if applicable);
- Certification of the accuracy and veracity of the report - Affidavit of General Compliance;
- Compliance Fee Report; and
- Documentation to support other data in the report.

Note: Pursuant to 15 D.C.M.R. § 2901.5(k), the total price paid may be submitted confidentially so long as the information is filed under seal pursuant to Commission Rule 150 (15 D.C.M.R. § 150) and is properly labeled. Suppliers that purchase RECs solely via bundled products are exempt from including the total price paid for Tier I, Tier II and Solar RECs in their annual compliance 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.



\_\_\_\_\_  
Signature

03/26/2020

\_\_\_\_\_  
Date

Mary Atkinson, VP Operations

\_\_\_\_\_  
Print Name and Title

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

**ATTESTATION OF GENERAL COMPLIANCE**

I, Officer/Attestor, Mary Atkinson, 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.



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Signature of Officer/Attestor

03/26/2020

Date

## Electricity Supplier Annual Compliance Report - DC RPS Program

Enter the appropriate figures into the following tables:

<b>Total Retail Electricity Sales</b>	<b>Block 1</b>
<b>Sales subject to current requirements</b>	<b>Block 1a</b>
<b>Sales subject to requirements prior to the CleanEnergy Act</b>	<b>Block 1b</b>
<b>Sales subject to requirements prior to the DGAA</b>	<b>Block 1c</b>
<b>Solar REC Obligation</b>	<b>Block 2</b>
<b>Solar REC Obligation under current requirements</b>	<b>Block 2a</b>
<b>Solar REC Obligation under requirements prior to the CleanEnergy Act</b>	<b>Block 2b</b>
<b>Solar REC Obligation under requirements prior to the DGAA</b>	<b>Block 2c</b>
<b>Tier I REC Obligation</b>	<b>Block 3</b>
<b>Tier I REC Obligation under current requirements</b>	<b>Block 3a</b>
<b>Tier I REC Obligation under requirements prior to the CleanEnergy Act</b>	<b>Block 3b</b>
<b>Tier II REC Obligation</b>	<b>Block 4</b>

Enter Compliance Year: 2019



- Block 1** Total retail electricity sales for the compliance year, Block 1 = Block 1a + Block 1b + Block 1c.
- Block 1a** Enter the amount of retail electricity sales subject to current requirements.
- Block 1b** Enter the amount of retail electricity sales subject to the requirements prior to the CleanEnergy DC Omnibus Amendment Act (CleanEnergy Act) of 2018 (for contracts entered into prior to the effective date of the Act on March 22, 2019).
- Block 1c** Enter the amount of retail electricity sales subject to the requirements prior to the Distributed Generation Amendment Act (DGAA) of 2011.
- Block 2** Tier I Solar REC obligation, Block 2 = Block 2a + Block 2b + Block 2c.
- Block 2a** Solar REC obligation, Block 2a = Block 1a\*Compliance Year Percentage for Solar under current requirements.
- Block 2b** Solar REC obligation, Block 2b = Block 1b\*Compliance Year Percentage for Solar under requirement prior to the CleanEnergyAct.
- Block 2c** Solar REC obligation, Block 2c = Block 1c\*Compliance Year Percentage for Solar under requirement prior to DGAA.
- Block 3** Tier I REC obligation, Block 3 = Block3a + Block 3b.
- Block 3a** Tier I REC obligation, Block 3a = Block 1a\*Compliance Year Percentage for Tier I under current requirements.
- Block 3b** Tier I REC obligation, Block 3b = (Block 1b+Block 1c)\*Compliance Year Percentage for Tier I under requirements prior to the CleanEnergy Act.
- Block 4** Tier II REC obligation, Block 4 = Block 1\*Compliance Year Percentage for Tier II.

Complete Block 1a, Block 1b, and Block 1c. The remaining Blocks will be calculated based on your entries.  
 Blocks 1b and 2b are only applicable for 3 compliance years--2019, 2020, and 2021.

An electricity supplier shall meet the solar requirement by obtaining the equivalent amount of renewable energy credits from solar energy systems no larger than 15MW in capacity located within the District or in locations served by a distribution feeder serving the District.

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

**Electricity Supplier:** Freepoint Energy Solutions LLC  
**Point of Contact:** Lena Davila  
**Title:** Compliance Analyst  
**Address:** 3050 Post Oak Blvd., Ste 1330  
Houston, Texas 77056  
  
**Phone:** 713-239-8074  
**E-mail:** ldavila@freepointsolutions.com  
**Fax:** 713-583-9087

**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		Block 7 = Block 2 (Sales Tab) * Block 6
Shortfall of Solar RECs		Block 8
Solar REC Compliance Fee Rate		\$/MWH
<b>Solar Energy Compliance Fee</b>		<b>Block 9</b>

**The calculations below reflect the new solar REC pricing under the RPS Expansion Amendment Act of 2016 and the RPS Omnibus Amendment Act of 2018.**

Solar		
Solar RECs Used for Compliance		Block 10
Percentage of Retail Sales		Block 11 = 100% - Block 6
Solar Energy Compliance Amount		Block 12 = Block 2 (Sales Tab) - Block 7
Shortfall of Solar RECs		Block 13
Solar REC Compliance Fee Rate		\$/MWH
<b>Solar Energy Compliance Fee</b>		<b>Block 14</b>

**Solar RECs submitted above, in Blocks 5 and 10, are used to meet the Tier I REC requirements.**

Tier I		
Tier I RECs Used for Compliance (including Solar RECs)		Block 15
Tier I Compliance Amount		Block 16
Shortfall of Tier I RECs		Block 17
Tier I Compliance Fee Rate		\$/MWH
<b>Tier I Compliance Fee</b>		<b>Block 18</b>

Tier II		
Tier I or Tier II RECs Used for Compliance (MSW disallowed)		Block 19
Tier II Compliance Amount		Block 20
Shortfall of Tier II RECs		Block 21
Tier II Compliance Fee Rate		\$/MWH
<b>Tier II Compliance Fee</b>		<b>Block 22</b>

<b>Total Compliance Fee Due</b>		<b>Block 23</b>
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Enter the supplier contact information in the yellow highlighted area above. The compliance fee calculation 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 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 figure is carried over from Block 3 (Sales Tab)
- Block 17** Shortfall amount for Tier I REC compliance, Block 17 = Block 16 - Block 15

**Block 18** Compliance Fee Due for the Tier I Obligation.  
 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 retail sales (subject to Block 6) in compliance year 2021;  
 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;  
 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;

