17-03046
Public Utilities Commission of Nevada
Electronic Filing
Submitted: 4/6/2017 1:16:49 PM
Reference: a3845e9e-00a2-4a1c-9b5f-d9a0f510d2fb
Reference:
Filed For: Exelon Generation Company LLC

In accordance with NRS Chapter 719,
this filing has been electronically signed and filed
by: /s CatherineStanley

By electronically filing the document(s),
the filer attests to the authenticity of the electronic signature(s) contained therein.

This filing has been electronically filed and deemed to be signed by an authorized
agent or
representative of the signer(s) and
Exelon Generation Company LLC
April 6, 2017

Via Electronic Filing

Bre Potter, Commission Secretary
Public Utilities Commission of Nevada
1150 East William Street
Carson City, NV 89701

Re: Amendment to Exelon Generation Company, LLC’s Annual Renewable Portfolio Standard Compliance Report for 2016; Docket No. 17-03046

Dear Ms. Potter:

Enclosed please find a revised public version of Exelon Generation Company, LLC’s (“Exelon”) Annual Renewable Portfolio Standard Compliance Report for 2016, originally filed on March 31, 2017. This revised version redacts additional information from the report for which Exelon is seeking confidential treatment.

Please do not hesitate to contact me at kate.stanley@constellation.com or 410-470-3148 with any questions or concerns.

Sincerely,

/s Catherine Stanley
Catherine Stanley
Analyst, Legal Compliance
March 31, 2017

Via Electronic Filing

Bret Potter, Commission Secretary
Public Utilities Commission of Nevada
1150 East William Street
Carson City, NV 89701


Dear Ms. Potter:

Enclosed for filing is Exelon Generation Company, LLC’s (“Constellation”) aforementioned filing, which includes: (1) Draft Public Notice of the filing; (2) confidential and non-confidential versions of the Annual Renewable Portfolio Standard Compliance Report for 2016 (Confidential Exhibit A and Non-Confidential Exhibit A); and (3) Required Attestation Letters in Exhibit B.

This filing complies with the requirements of NAC 704.8877 and NAC 704.8879 (requiring providers of electric service to submit to the Commission an annual report regarding compliance with the portfolio standard for the previous compliance year). In particular, NAC 704.8877 and NAC 704.8879 require that the following information be set forth:

NAC 704.8879(2)(a): The capacity of each renewable energy system owned, operated or controlled by the provider, the total number of kilowatt-hours generated by each such system during the most recently completed compliance year and the percentage of that total amount which was generated directly from renewable energy.

Constellation does not own, operate, or control any renewable energy systems in Nevada, as discussed in section 2.2.

NAC 704.8879(2)(b): Whether the provider began construction on, acquired or placed into operation any renewable energy system.

Constellation did not begin construction on, acquire, or place into operation any renewable energy system in Nevada in 2016, as discussed in section 2.3.

NAC 704.8877(1)(a) and NAC 704.8879(2)(c): The total number of kilowatt-hours sold by the provider to its retail customers in this State during the most recently completed compliance year.

Retail sales for Constellation for the calendar year 2016 are reported in Section 2.4.

NAC 704.8879(2)(d): The total number of kilowatt-hours that the provider generated, acquired or saved from portfolio energy systems or efficiency measures during the most recently completed
compliance year and, from that total number of kilowatt-hours, subtotals for the number of kilowatt-hours: (1) Generated or saved by the provider from its own portfolio energy systems or efficiency measures; (2) Acquired by the provider pursuant to long-term portfolio energy credits contracts; (3) Acquired by the provider pursuant to long-term renewable energy contracts; (4) Acquired by the provider pursuant to short-term portfolio energy credits contracts; (5) Acquired by the provider pursuant to short-term renewable energy contracts; (6) Acquired or saved by the provider pursuant to energy efficiency contracts; (7) Attributable to the provider from solar thermal systems; (8) Fed back to the provider from net metering systems used by customer-generators pursuant to NRS 704.766 to 704.775, inclusive; (9) Deemed to be electricity that the provider generated or acquired from a renewable energy system for the purposes of complying with its portfolio standard pursuant to paragraph (a) of subsection 3 of NRS 704.775; and (10) Saved by the provider as a result of energy efficiency measures installed at service locations of residential customers of the provider for the purposes of paragraph (b) of subsection 2 of NRS 704.7821.

The required information is provided in section 2.5.

NAC 704.8879(2)(e): The total number of kilowatt-hours that the provider: (1) Sold as a result of customer participation in a voluntary option to purchase all or a portion of the customer’s energy from renewable resources; and (2) Sold pursuant to paragraphs (b) and (c) of subsection 2 of NRS 704.7828.

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kwh renewable energy were sold pursuant to this requirement, as discussed in Section 2.6.

NAC 704.8879(2)(f): The total number of kilowatt-hours that the provider: (1) Carried forward as excess from the previous compliance years; (2) Intends to carry forward as excess from the most recently completed compliance year; (3) Intends to carry forward as excess from previous compliance years, indicating the amount from each separate year; (4) Carried forward as deficiencies from previous compliance years; (5) Intends to carry forward as deficiencies from the most recently completed compliance year; and (6) Intends to carry forward as deficiencies from previous compliance years, indicating the amount from each separate year.

The required information is provided in section 2.7.

NAC 704.8877(1)(b)-(c) and NAC 704.8879(2)(g)-(h): The estimated amount of retail sales the provider expects to sell to its retail customers during the current compliance year and the estimated number of kilowatt-hours that the provider must generate or acquire from renewable energy systems to comply with its renewable portfolio standard for the current compliance year.

Estimated 2017 retail sales in kilowatt-hours is reported in section 2.8. The number of PECs that Constellation will be required to generate or acquire in 2017 based on this estimate is provided in section 2.9.

NAC 704.8879(2)(i): The estimated costs for the utility provider to comply with its portfolio standard for the current compliance year 2017.

This reporting requirement is not applicable to Constellation because it is not a utility provider, as explained in section 2.10.
NAC 704.8879(3)(a)-(b): The provider must make an affirmative showing that the provider complied with its portfolio standard.

Constellation is in compliance with its 2016 RPS requirements, as discussed in section 2.11 and as demonstrated by Confidential Exhibit A.

NAC 704.8879(4)(a)-(b): If the provider acquired any kilowatt-hours from a renewable energy system that is not owned, operated or controlled by the provider, the annual report must include an attestation from the owner or operator of the renewable energy system that the energy represented by those kilowatt-hours: (a) has not been and will not be sold or otherwise exchanged for compensation or used for credit in any other state or jurisdiction; and (b) has not been and will not be included within a blended energy product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

The signed attestations are provided in Exhibit B, as discussed in section 2.12.

If you have any questions or concerns pertaining to this filing, please do not hesitate to contact me at Cynthia.Brady@constellation.com or (630) 657-4449.

Sincerely,

/s Cynthia Brady

Cynthia Brady
Assistant General Counsel
DRAFT NOTICE
Pursuant to Nevada Administrative Code ("NAC") 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include ONE COPY of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(5)(a)):

**Exelon Generation Company, LLC Annual Renewable Portfolio Standard Compliance Report for 2016**

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(5)(b)):

**Exelon Generation Company, LLC**

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled AND the effect of the relief or proceeding upon consumers (see NAC 703.160(5)(c)):

This is Exelon Generation Company, LLC’s ("Constellation") 2016 annual renewable portfolio standard ("RPS") report filed pursuant to Nevada Revised Statutes ("NRS") chapter 704, sections 7821 to 7828, inclusive, and NAC chapter 704, sections 8831 to 8937, inclusive, including but not limited to, NRS 704.7825 and NAC 704.8879. This annual report provides information to the Public Utilities Commission of Nevada ("Commission") regarding the actions undertaken by Constellation to comply with the RPS requirements. Constellation has met its solar RPS requirements and non-solar RPS requirements. Constellation requests that the Commission issue an order finding (a) the non-solar renewable portfolio requirements for 2016 have been met; (b) the solar renewable portfolio requirements for 2016 have been met; and (c) Constellation may carry forward solar energy system portfolio energy credits ("PECs") and non-solar energy system PECs.

A statement indicating whether a consumer session is required to be held pursuant to NRS 704.069(1):

**A consumer session is not required to be held.**

If the draft notice pertains to a tariff filing, please include the tariff number AND the section number(s) or schedule number(s) being revised.

**This draft notice does not pertain to a tariff filing.**

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1 NRS 704.069 states in pertinent part:

1. …[T]he Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110 inclusive, in which:
   a. A public utility has filed a general rate application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and
   b. The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed $50,000 or 10 percent of the applicant’s annual gross operating revenue, whichever is less.
COMPLIANCE REPORT

PUBLIC

Unredacted Version Filed under Seal with the Commission


Exelon Generation Company, LLC
Annual Renewable Portfolio Standard Compliance Report, Compliance Year 2016

1. Introduction

Exelon Generation Company, LLC (“Constellation”) currently supplies purchased power to Wynn Las Vegas, LLC (“Wynn”) as its provider of new electric resources pursuant to NRS 704B. Accordingly, Constellation is a provider of electric service pursuant to NRS 704.7808. As such, Constellation is subject to the renewable portfolio standard (“RPS”) requirements of NRS 704.78213. Pursuant to NRS 704.7825 and NAC 704.8877 and NAC 704.8879, Constellation hereby submits its Annual RPS Compliance Report for 2016.

Constellation, a subsidiary of Exelon Corporation, is one of the nation’s leading marketers of electricity and related products in wholesale and retail markets.

Wynn is the owner and operator of the Wynn Las Vegas and Encore resort hotel and casino located in Las Vegas, NV.

In May 2015, Wynn filed with the Public Utilities Commission of Nevada (“Commission”) an application to purchase energy, capacity, and/or ancillary services from a provider of new electric resources pursuant to NRS 704B and NAC 704B. Wynn selected Constellation as its provider of new electric resources. The Commission issued an order approving Wynn’s application on January 20, 2016. Constellation began serving Wynn’s load on October 1, 2016.

Constellation’s 2016 RPS requirement for serving Wynn’s load is 20%, including a 6% solar requirement.

2. Constellation Annual Report Requirements

2.1 Overview

Constellation exceeded both the 2016 non-solar RPS requirement and the 2016 solar RPS requirement. After meeting its 2016 requirements, Constellation ended 2016 with a surplus of [redacted] kWh non-solar/non-energy efficiency PECs [redacted] kWh solar PECs. As a result of this surplus, Constellation requests that the Commission allow it to carry forward each of these surplus amounts.

The following sections and exhibits contain the reporting information required by NAC 704.8879 for annual reporting by providers. For convenience, Constellation has listed the specific requirements of the RPS Annual Compliance Report as set forth in NAC 704.8879(2).

2.2 Capacity

**NAC 704.8879(2)(a):** The capacity of each renewable energy system owned, operated or controlled by the provider, the total number of kilowatt-hours generated by each system during the most recently completed compliance year and the percentage of that total amount which was generated directly from renewable energy.

Constellation does not own, operate, or control any renewable energy systems in Nevada.


2.3 New Systems

**NAC 704.8879(2)(b):** Whether, during the most recently completed compliance year, the provider began construction on, acquired or placed into operation any renewable energy system and, if so, the date of any such event.

Constellation did not begin construction on, acquire, or place into operation any renewable energy system in Nevada in 2016.

2.4 Retail Sales in 2016

**NAC 704.8879(2)(c):** The total number of kilowatt-hours sold by the provider to its retail customers in this State during the most recently completed compliance year.

Constellation sold [redacted] kilowatt-hours to Wynn in 2016.

2.5 RPS Compliance Total and Summary of RPS Sources

**NAC 704.8879(2)(d):** The total number of kilowatt-hours that the provider generated, acquired or saved from portfolio energy systems or efficiency measures during the most recently completed compliance year and, from that total number of kilowatt-hours, subtotals for the number of kilowatt-hours: (1) Generated or saved by the provider from its own portfolio energy systems or efficiency measures; (2) Acquired by the provider pursuant to long-term portfolio energy credits contracts; (3) Acquired by the provider pursuant to long-term renewable energy contracts; (4) Acquired by the provider pursuant to short-term portfolio energy credits contracts; (5) Acquired by the provider pursuant to short-term renewable energy contracts; (6) Acquired or saved by the provider pursuant to energy efficiency contracts; (7) Attributable to the provider from solar thermal systems; (8) Fed back to the provider from net metering systems used by customer-generators pursuant to NRS 704.766 to 704.775, inclusive; (9) Deemed to be electricity that the provider generated or acquired from a renewable energy system for the purposes of complying with its portfolio standard pursuant to paragraph (a) of subsection 3 of NRS 704.775; and (10) Saved by the provider as a result of energy efficiency measures installed at service locations of residential customers of the provider for the purposes of paragraph (b) of subsection 2 of NRS 704.7821.

<table>
<thead>
<tr>
<th>Description</th>
<th>kWh</th>
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<tbody>
<tr>
<td>1. Generated or saved from owned portfolio energy systems or energy</td>
<td></td>
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<tr>
<td>efficiency measures</td>
<td></td>
</tr>
<tr>
<td>2. Acquired pursuant to long-term portfolio energy credit contracts</td>
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<tr>
<td>3. Acquired pursuant to long-term renewable energy contracts</td>
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<tr>
<td>4. Acquired pursuant to short-term portfolio energy credit contracts</td>
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<tr>
<td>5. Acquired pursuant to short-term renewable energy contracts</td>
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</tr>
<tr>
<td>6. Acquired or saved pursuant to energy efficiency contracts</td>
<td></td>
</tr>
<tr>
<td>7. Attributable to the provider from solar thermal systems</td>
<td></td>
</tr>
<tr>
<td>8. Fed back to the provider from net metering systems used by customers</td>
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<tr>
<td>pursuant to NRS 704.766 to 704.775, inclusive</td>
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<tr>
<td>9. Deemed to be electricity that the provider generated or acquired</td>
<td></td>
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</tbody>
</table>
2.6 2016 Certain Sales

**NAC 704.8879(2)(e):** The total number of kilowatt-hours that the provider: (1) Sold as a result of customer participation in a voluntary option to purchase all or a portion of the customer’s energy from renewable resources; and (2) Sold pursuant to paragraphs (b) and (c) of subsection 2 of NRS 704.7828.

[5000 kWh] renewable energy were sold pursuant to this requirement.

2.7 2016 Carry Forwards

**NAC 704.8879(2)(f):** The total number of kilowatt-hours that the provider: (1) Carried forward as excess from the previous compliance years; (2) Intends to carry forward as excess from the most recently completed compliance year; (3) Intends to carry forward as excess from previous compliance years, indicating the amount from each separate year; (4) Carried forward as deficiencies from previous compliance years; (5) Intends to carry forward as deficiencies from the most recently completed compliance year; and (6) Intends to carry forward as deficiencies from previous compliance years, indicating the amount from each separate year.

| Carried forward as excess from the previous compliance years | 2012 – 2015: |
| Intends to carry forward as excess from the most recently completed compliance year | 2016: |
| Intends to carry forward as excess from previous compliance years, indicating the amount from each separate year | 2012- 2013: |
| Intends to carry forward as excess from previous compliance years, indicating the amount from each separate year | 2015: |

2.8 2017 Estimated Sales

**NAC 704.8879(2)(g):** The estimated number of kilowatt-hours that the provider expects to sell to its retail customers in this State during the current compliance year.

For 2017, Constellation expects to provide [6000 kWh] to Wynn.

2.9 2017 Estimated Credit Requirement
Exelon Generation Company, LLC
Annual Renewable Portfolio Standard Compliance Report, Compliance Year 2016

NAC 704.8879(2)(h): The estimated number of kilowatt-hours that the provider must generate, acquire or save from portfolio energy systems or efficiency measures to comply with its portfolio standard for the current compliance year, as calculated by the provider pursuant to NAC 704.8877.

For 2017, Constellation’s RPS requirement for Wynn will be 20%, with a solar requirement of 6%. Based on its sales projections, Constellation’s RPS requirement for Wynn will be [redacted] kWh.

2.10 2017 Estimated Costs

NAC 704.8879(2)(i): If the provider is a utility provider, the estimated costs for the utility provider to comply with its portfolio standard for the current compliance year. If appropriate, the utility provider must report such estimated costs for each major type of cost, such as general and administrative costs and costs for purchased power.

This reporting requirement is not applicable to Constellation because it is not a utility provider.

2.11 Affirmative Showing of RPS Compliance

Pursuant to NAC 704.8879(3), Constellation must make an affirmative showing that it complied with its renewable portfolio standard during the most recently completed compliance year.

Based on the foregoing, and as demonstrated in Confidential Exhibit A, Constellation has met its RPS requirements for compliance year 2016. Based on its total sales of [redacted] kWh of electricity to Wynn during 2016, Constellation’s RPS requirement for 2016 is [redacted] PECs. Of the total [redacted] PECs required, at least [redacted] PECs must be attributable to solar renewable energy sources and [redacted] PECs can be attributable to non-solar renewable energy sources and energy efficiency measures.

Constellation is required to have [redacted] PECs from solar energy systems and has [redacted]. Thus, Constellation met its solar RPS requirements and requests that it be authorized to carry forward [redacted] solar PECs.

Constellation is required to have [redacted] PECs from non-solar energy systems and energy efficiency measures and has [redacted]. It has applied energy efficiency PECs and [redacted] non-solar energy system PECs. Thus, Constellation met its non-solar RPS requirements and requests that it be authorized to carry forward [redacted] non-solar energy system PECs.

2.12 Attestations

Because Constellation acquired kilowatt-hours from renewable energy systems that are not owned, operated or controlled by it to comply with its portfolio standard during 2016, NAC 704.8879(4) requires Constellation to provide separate attestations from the owner or operator of the renewable energy system that the energy represented by those kilowatt-hours: (a) has not been and will not be sold or otherwise exchanged for compensation or used for credit in any other state.
or jurisdiction; and (b) has not been and will not be included within a blended energy product certified to include a fixed percentage of renewable energy in any other state or jurisdiction.

These individual attestations are provided in Exhibit B.

3.0 Conclusion

Based on the foregoing, Constellation requests that the Commission issue an order finding: (a) the non-solar renewable portfolio requirements for 2016 have been met; (b) the solar renewable portfolio requirements for 2016 have been met; and (c) Constellation may carry forward: [REDACTED] solar energy system PECs and [REDACTED] non-solar energy system PECs.
Exhibit A
Supporting Documentation

PUBLIC
Unredacted Version Filed under Seal with the Commission
Exhibit B

Attestation Letters

PUBLIC

Unredacted Version Filed under Seal with the Commission
CERTIFICATE OF SERVICE
CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing EXELON GENERATION COMPANY, LLC ANNUAL RENEWABLE PORTFOLIOS STANDARD COMPLIANCE REPORT FOR 2016 IN Docket 17-__ upon the persons listed below by electronic mail:

Tammy Cordova
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701
tcordova@puc.nv.gov

Staff Counsel Division
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, NV 89701
Puen.sc@puc.nv.gov

Attorney General’s Office
Bureau of Consumer Protection
100 N. Carson St.
Carson City, NV 98701
bcpserv@ag.nv.gov

DATED this 31st day of March 2017

/Signature
Catherine Stanley
Analyst, Legal Compliance
Exelon Business Services Company, LLC