

# Change Control and Issues Request Form

Change Control Forms will not be accepted unless submitted by a member of the Stakeholders Advisory Committee (SAC)

**\*All change control forms must be received one week prior to the next SAC meeting in order to be available for presentation at that meeting.**

Instructions: Fill out all required fields below and submit to [wregishelp@wecc.biz](mailto:wregishelp@wecc.biz).

*Items in blue are for office use only*

Status:

Date Requested: May 17, 2010

Project Issue/Change Request ID (PIR/PCR): PCR-186

Type of Change/Request:

Title of Change/Request: Retroactive Creation of WREGIS Certificates for Periods in Excess of 75 Days Prior to Registration.

Priority:  Urgent  High  Medium  Low

Target Date: July 1, 2010

Requested By: Jeremy Weinstein

Phone Number: 925-943-3103

E-mail Address: jeremy.weinstein@pacificcorp.com

Organization: PacifiCorp

## Description:

WREGIS Operating Rule 12.9 allows for creation of WREGIS Certificates for periods preceding the generator registration with WREGIS. Currently, WREGIS is hard-coded to prevent Certificate creation for periods exceeding 75 days prior to registration. This Change Control requests Certificate creation for earlier periods, provided that the generator pays fees to WREGIS equal to (a) the current charges, or incremental amount thereof, for generator registration for any such year or part thereof not previously paid by the generator account holder for its portfolio had the applicable generator been registered in WREGIS at the time, plus (b) a service fee per generator unit data entry batch review by WREGIS staff of \$\_,000, to replace the current requirement of state payment for staff time (with WREGIS staff to identify the reviews required).

## APX Response:

## Rational / Benefit / Need:

The generators and regulators using WREGIS will benefit from retroactive certificates, but the system should also be protected from gaming, and scarce WREGIS staff time and tight state budgets should be protected. Therefore, an amount equivalent to back fees, if any, should be payable to prevent generators from delaying registration in order to use the retroactivity feature. Providing for a minimum service fee that covers the amount that would otherwise have been charged to states under Operating Rule 12.9 will not only protect state budgets, but set a self-selecting threshold for use of valuable WREGIS staff time.

Additionally, an expansion of retroactive Certificate creation should help with generators generating test energy for long periods prior to commercial online date and registration.

Generators should understand that retroactive Certificate creation will not change any legal or regulatory WREGIS Certificate date or deadline requirements. Additionally, it is the generator's responsibility to make arrangements for any required Qualified Reporting Entity (QRE) services or support, including any costs of such QRE services or support. Nothing in this change requires QREs to perform any service without compensation.

WREGIS disclaims any responsibility for or representation respecting the generator's legal authority to sell wholesale energy, for periods before or after registration.

Nothing in this change would prevent states from themselves requiring of a specific generator and paying for retroactive WREGIS Certificate creation in the manner currently provided in the Operating Rules. Nothing in the change is intended to affect any requirement of any voluntary program.

Capturing more REC vintages also decreases the potential for erroneous, improper or fraudulent claims by converting a difficult-to-audit paper attestation process into the more-transparent WREGIS process, especially when carried forward by compliance program reporting.

**Consequences of Not Implementing Change:**

Not implementing the change will (a) increase scarcity of WREGIS Certificates and regulated entity compliance opportunities that would otherwise be mitigated through this change and (b) further disadvantage specific generators that have been delivering electricity but had delays achieving commercial operation

**Deliverables:**

**Estimate for Scheduled Release:**

**Cost Impact:**

**Total Cost Estimate:**

**Risk and Issues Involved:**

**External Impacts:**

**Approvals:**

APX:  Date:

CEC/WREGIS:  Date:

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## Attachments / References:

WREGIS Operating Rules Section 12.9.

## Notes:

Please send to SAC:

Contact Person Jeremy Weinstein

- external counsel for PacifiCorp

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