



WREGIS Project - Change Control

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Change Request Form

Project Request ID: PCR-186 Revised Status: Open	Requested by: Jeremy Weinstein (Pacific Corp) / Kari Clark (Xcel Energy)	Type of Change: Certificate creation	Date Requested: 10/14/2011 Target Date: 12/01/2011 Priority: High
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Title: Creation of WREGIS Certificates for Pre-COD Energy Periods in Excess of 75 Days Prior to Registration.

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 pre-COD energy from periods prior to WREGIS approval, 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). This PCR is restricted to created WREGIS certificates only for pre-COD energy generation.

NYSE Blue Response: To accommodate this request, NYSE Blue will need to:

- Develop new pending status for uploaded meter data
- Implement triggers that will put data in to this new pending status if meter data is prior to the current 75 day window for new generators
- Create new report for WREGIS administrator to review meter data in this new pending status
- Implement functionality to allow WREGIS administrator to approve data in new pending status
- Once approved by WREGIS administrator, create back end database processes for data outside of 75 day window to create certificates



WREGIS Project - Change Control

- This code fix will accommodate newly approved generators as well as existing generators as long as the data is within the current 2 year adjustment window.

Reason for Change:

The generators and regulators using WREGIS will benefit from retroactive certificates for pre-COD energy, 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, and a minimum service fee should be payable to prevent generators from delaying registration in order to use the pre-COD energy retroactivity feature.

Additionally, an expansion of retroactive Certificate creation should help with generators generating pre-COD 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.

Consequences of Not Implementing Change:

Not implementing the change will (a) disadvantage generators that have been delivering electricity but had delays achieving substantial completion or commercial operation and (b) decrease regulated entity compliance opportunities that would otherwise be mitigated through this change.

Estimate for Scheduled Release: To be determined

Cost Impact: Per contract, will be implemented on a Time & Material basis, at \$175/hour.

Coding/Bug Fix/Unit Test: 32 hours, 1 Resource

System Test, Regression Test and UAT: 16 hours, 1 Resources

Total Cost Estimate: 48 hours, \$8,400



WREGIS Project - Change Control

Risk & Issues Involved: None to our knowledge

External Impacts: None to our knowledge

Attachments/References:

Approvals

NYSE Blue: Katherine Graham

Date: 1/06/2012

WREGIS:

Date:



WREGIS Project - Change Control

Notes:

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