

WREGIS - Change Control

Change Control & Issues Request Form			
Organization: CEC	Requested by: Kate Zocchetti	Date Requested: 1/7/2010	
Phone number: 916-653-4710	E-mail address: kzocchet@energy.state.ca.us	Priority: Please circle	
		Urgent	High XX
		Medium	Low
Title: PCR 177 Adding Field for “Associated NERC E-Tags not Available in WREGIS”		Target date: March 2010	
<p>Description: California seeks to add another field to the drop-down menu for selecting NERC E-tags to document energy delivery. Currently there are three fields: “In-state/province power purchase,” “Out-of-state power purchase,” and “NERC E-Tag Not Required for Compliance.”</p> <p>California RPS staff seeks to add “Associated NERC E-tags not available in WREGIS” as a fourth option.</p>			
<p>Rational/Benefit/Need: There are several participating states that do not require NERC E-Tags from out of state deliveries; however, California has that requirement. California’s RPS requires that retail sellers demonstrate delivery of energy into California from out-of-state facilities for RPS compliance, and requires use of data from NERC E-tags to document such delivery. Although WREGIS has the functionality to capture NERC E-tag data and import it into WREGIS, there are situations when this data is unavailable to the retail seller that needs to demonstrate delivery. For example, some retail sellers have failed to sign up with WREGIS to use this service. For the most part, however, this situation arises when a third party imports energy into California on behalf of a retail seller. In these cases, the associated NERC E-tags are not transferred to the retail seller from the third party’s account (this situation is being addressed by the NERC E-Tag Working Group) and the NERC E-tags are not available to the retail seller for retirement. Until both of these situations are resolved, the CEC plans to allow retail sellers to use the CEC’s Interim Tracking System to document delivery, which uses NERC E-tags but does not rely on WREGIS to provide the NERC E-tag data.</p> <p>Having the option to select the option, “Associated NERC E-tags not available in WREGIS” would reduce confusion for certain retail sellers because the current three fields are not applicable to their situations. Further, a field indicating that associated NERC E-tags not available in WREGIS would alert the CEC staff that the Interim Tracking System must be employed to verify delivery from out of state facilities in those circumstances.</p>			

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Consequences of not Implementing Change:

Retail sellers that intend to retire WREGIS Certificates for generation from out of state facilities could be confused because if they select “out of state/province power purchase,” then WREGIS will prompt them to “Get Tags” with a pop-up window even though the associated NERC E-tag data is not available in WREGIS to document delivery for certain retail sellers. Energy Commission staff would need to guide those retail sellers to select “Out of state power purchase” as the reason, but NOT to click on “Get Tags” and instead to type “Associated NERC E-tags not available in WREGIS” in the text box labeled “Additional details.” Alternatively, they could be guided to select “NERC E-Tag Not Required for Compliance,” which would not trigger the “Get Tags” pop-up button, but which is an incorrect statement for California’s RPS and could cause additional confusion because the retail seller IS required to provide NERC E-tag data associated with RECS from out of state facilities for California’s RPS compliance.

Attachments/References:

Slides #9 and #10 from WREGIS training slides, available at <http://www.wregis.org/uploads/files/324/WREGIS%20NERC%20Tag%20Training-FINAL.pdf>

Signature:**Date:****Please send to SAC:**

**Contact Person
Address**

Phone number

E-Mail