

Description and Priority of System Request	WREGIS Committee Approval Criteria	Cost-Allocation, if Approved
1 Changes that are beneficial or necessary for the operation and use of WREGIS. Most frequently requested by WREGIS staff, but could be requested by any interested party. <i>[Note 1]</i>	Change is beneficial and cost-effective	WREGIS/CEC pays 100% <i>[Note 6]</i>
2 Requests that provides significant benefit to the system and/or to all or a large portion of Account Holders. <i>[Note 2]</i>	Change is beneficial and cost-effective	WREGIS/CEC pays 100%
3 Requests that attract or permit new users and generate REC activity <i>[Note 3]</i>	New activity is desired, System Change is most cost-effective means of adding activity	WREGIS/CEC pays up to 2 years of estimated incremental fees <i>[Note 7]</i> Requestor pays balance
4 Requests that directly benefit only the requester <i>[Note 4]</i> and don't necessarily add high value to other participants or the WREGIS program; I.e., doesn't fit (1), (2), or (3)	No harm to system <i>[Note 5]</i>	Requestor pays 100% <i>[Note 8]</i>
5 One time requests, special reports, or requests for public for information not already public or in a non-standard format.	No harm to system.	Requestor pays 100%

If APX is unable to accomplish all approved projects within desired timeframes, categories (1) and (2) would be given priority, and remaining requests prioritized by date received.

NOTES TO MATRIX

DESCRIPTION AND PRIORITY OF SYSTEM REQUEST

Note 1: “Changes that are beneficial or necessary”: Examples of “beneficial” changes are those that:

- Ease administrative burdens, for example, automate manual processes that regularly consume a significant portion of time for the WREGIS staff; such as
 - Automatically compute percentages or increments that otherwise are done manually
 - Streamline processes to allow for multiple Administrator input simultaneously where currently only single inputs are allowed
 - Add interfaces that allow for more control of the system by the Administrator where currently such control is by APX only
- Fix software problems
- Add functionality or respond to technological changes in how information is reported

This is intended to refer to burdens on WREGIS staff, although if a change would benefit all or most users and save significant time for a significant number of Account Holders, it could fit within this category. The thresholds in Note 2, below, may be used to assist in evaluating what is a “significant number of Account Holders”.

Note 2: “Significant Benefits to the system and/or a large portion of Account Holders. The threshold portion of Account Holders will be measured as follows:

- 30% of all Account Holders, or
- Account Holders representing on average 25% of RECs generated in the past calendar year, or
- Account Holders representing 30 % of the total account holders belonging to a given account holder class (as defined by WREGIS Committee (WC) representation).

Note 3: “Requests that attract or permit new users and generate REC activity” Examples of such requests might include:

- adding new states or provinces
- interface with MRETS and other tracking systems
- requests from current or potential large Account Holders as defined above

The benefit from REC activity will be calculated based on the present value of estimated revenues likely to be generated by the new user, including annual fees and REC activity, for a period of up to two (2) years. This calculation will be a joint effort between the potential new user and staff.

Note 4: “Requests that benefit only the requester”: Examples might be:

- Account Holder name change. This would apply where a State, Provincial or Voluntary Program Administrator wanted to change its program name as viewed in the generator registration form and other related forms and reports. The system would need programming changes so that certificates reflected the eligibility under the new name rather than the old.
- Changes for administrative convenience of Account Holder only, with no benefit to the system or discernable benefit to other Account Holders

WREGIS COMMITTEE APPROVAL CRITERIA

Note 5: “No harm to system”: Some changes would likely not adversely affect the WREGIS system.

Some examples include:

- No degradation to the system
- No harm to other Account Holders or their ability to utilize the system
- No changes to functionality that would impair WREGIS’ ability to verify regulatory requirements
- No changes that would constitute a change in WREGIS policy or operating procedures without express discussion of the impact

COST ALLOCATIONS

Note 6: “WREGIS/CEC pays 100%”: Applicants are reminded that if neither entity has funds to pay, or if limitations require prioritizing funding, then an approved change, even if in this category, may either not be effected, or must be paid by users in some fashion.

Note 7: Incremental fees: “Incremental” here means measurement of fees and other revenues from the particular new user and the activity it is estimated to generate. If the costs exceed the estimated benefits, then the requester would pay the balance. Consistent with limits in Note 3, above, the calculation will be based on present value and could include annual fees and transaction fees from estimated activity of the user’s RECs. This calculation will be a joint effort between the potential new user and WREGIS staff.

Note 8: “Requester pays 100%”: A requester who pays all the cost may receive a partial refund if additional Account Holders subsequently join WREGIS, and use or benefit from the change funded by the original requester. Similar to line extension allowances, the secondhand subsequent user(s) would pay 20% of the cost and WREGIS will refund that payment to the original requester. To keep administrative burdens reasonable, any refunds are limited to a two-year period following the payment, only apply to initial payments that exceed \$2,500, and will cease if and when the original requester receives 80% of its initial payment. WREGIS staff will track potential refunds upon request from the Account Holders making the initial payments. The request must be made at the time the initial payments for the change services are submitted.

WREGIS COST ALLOCATION MATRIX

Introduction:

The California Energy Commission may fund upgrades to the WREGIS program software up to the amount of \$243,000 annually for FY 2009 and FY 2010¹. The WREGIS budget shows this as “SDT&O Change Control” (in this memo, the “Fund”). Because the Energy Commission – APX Contract provides for a maximum of four years of change control paid by the Energy Commission, any upgrades after June 2011 must be funded from another source.

All requests for changes to the WREGIS software go through the Change Control process, and all have been paid by the Fund to date². The Energy Commission – APX contract provides for the general use of the Fund and the process for requesting changes; however, it does not provide firm policy or guidelines on whether the Fund should pay for all changes, with or without reimbursement from the requester to WECC to offset WREGIS costs, or whether some requests should be billed in whole or part to the party requesting a change. The contract also is silent on amortizing costs across all users.

The WREGIS Committee examined these issues and formulated guidelines for staff to apply in making recommendations on cost recovery for changes to the WREGIS system. The WREGIS Committee’s overall policy is, where appropriate, to share costs in some manner so that changes are not “free” to the requester, to help conserve resources and discourage casual or unnecessary requests.

¹ This represents 1800 hours of APX time annually. Unused hours roll over to the next fiscal year, which runs from June 25 to June 24.

² This paper discusses the most typical changes, and the only ones that have arisen thus far: lump-sum, one time payments to APX. In PIR 131, which is still open, a different issue has presented itself: a lump-sum payment to OATI rather than to APX, to be followed by ongoing monthly payments to OATI.