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.

Items in blue are for office use only

Status:

Date Requested: 27 September 2010 Project Issue/Change Request ID (PIR/PCR): PCR-192

Type of Change/Request:

Title of Change/Request: Oregon RPS retro-REC Creation.

Priority: ☐ Urgent ☒ High ☐ Medium ☐ Low **Target Date**: 27 December 2010 - dec

Requested By: Kip Pheil	Phone Number: 503-378-4442
E-mail Address: kip.pheil@odoe.state.or.us	
Organization: Oregon Dept. of Energy (ODOE)	

Description:

The Oregon RPS allows a utility to meet compliance obligations with Qualifying Electricity (QE) anytime on or after January 2007.

The Oregon RPS further requires that a utility must have QE accounted for through creation of associated REC output in WREGIS to establish compliance.

Based on a variety of factors related to the passage of the Oregon RPS, launch of WREGIS, and varied dates of GU registration a varying amount of QE for any given GU may not be perfected as WREGIS-issued REC output. During discussions around the Oregon RPS, this potential QE is referred to as stranded generation, stranded QE, or stranded RECs.

QE which has not been perfected as WREGIS-issued REC output falls into these categories (please note that this follows my understanding of the functions and capabilities of the WREGIS software as currently configured but has not been confirmed with WREGIS staff):

A. Generation prior to WREGIS launch
(vintages from 01/2007 through 05/2007)
WREGIS has not created any REC output for this period that pre-dates the launch of on-line activity. WREGIS software, as currently configured, prevents creation of any REC output for a vintage prior to 06/2007.

Action requested:
Modify WREGIS software to remove or modify the 06/2007 limit on retroactive REC creation.
WREGIS. Entry of generation data also depends on arrangements with the relevant QRE. (SEE NOTES)

APX Response:

Rational / Benefit / Need:

The concepts behind the Oregon RPS were the outgrowth of deliberations by the Renewable Energy Working Group formed by Governor Kulongoski in order to pursue the Renewable Energy Action Plan of 2005. Owing to this timing, the Oregon RPS developed somewhat concurrently with the development of WREGIS. As such, the Oregon RPS statute identified WREGIS as an option for a REC system. Oregon did not create an alternative system and has a strong bias to rely on WREGIS for all REC accounting.

With the first compliance year of 2011 approaching, Oregon utilities and other eligible GU owners as well as additional REC market participants are seeking certainty about the extent, and at what cost, WREGIS-issued REC output for all QE which eligible for the Oregon RPS will be available for compliance.

A WREGIS Committee decision in December 2010 provides time to consider alternatives during the 2011 legislative session (see Consequences, below) if needed.

System updates to provide for retroactive REC creation should not be needed before early 2011.

Removal or modification of the existing hard limits to retroactive REC creation increases the flexibility of WREGIS and enhances the ability of the system to satisfy a wider array of programs and account holders.

Consequences of Not Implementing Change:

An advisory committee has met three times since July 2010 to review possible Oregon RPS rule making. At the most recent meeting, a group of Oregon utilities submitted draft language to establish an alternative system to address QE from January 2007 through March 2012. Whether an alternative system can or will be instituted through rule making cannot be known at this time. If no solution is found prior to the 2011 Oregon legislative session it seems likely a change in statute would be proposed.

In either case, development of an alternative method to account for QE for the Oregon RPS may undermine continued reliance on WREGIS.

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:

Notes:

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(vintages from 01/2007 through 05/2007)
WREGIS has not created any REC output for this period that pre-dates the launch of on-line activity. WREGIS software, as currently configured, prevents creation of any REC output for a vintage prior to 06/2007.

Action requested:
Modify WREGIS software to remove or modify the 06/2007 limit on retroactive REC creation.

B. Generation following WREGIS launch but past adjustment window
(vintages from 06/2007 to about 09/2008)
The earliest REC output possible from GU depends on the unit's registration in WREGIS. Entry of generation data also depends on arrangements with the relevant QRE.

WREGIS software, as currently configured, prevents creation of any REC output that precedes the date of registration by more than about 730 days. The actual limit is 730 days after the end of the reporting period so generation within a specific reporting period, but beyond the limit, can be entered in the system by WREGIS staff retroactively. As the end of each reporting period slips beyond the 730 day limit, an additional batch of potential REC output falls into this category.

Action requested:
Modify WREGIS software to remove or modify the 730 limit for entry for generation entry by WREGIS staff.

C. Generation following WREGIS launch and within adjustment window
(vintages from about 09/2008 to varied end dates)
Similar to category B but generation still within the 730 day limit which can be entered in the system by WREGIS staff retroactively.

Action requested:
None at this time; this does not appear to be a limitation to retroactive creation of REC output.