

**WREGIS Operating Rules Comments/Responses**

**PacifiCorp:**

- Page 20-23, WREGIS Account Structure: with the deletion of subaccount quantity limitations, is there any other documentation maintained by WREGIS that provides any current limitation (or lack thereof)?
- Page 77 (Appendix C, WREGIS Interface Control Document for State & Provincial & Voluntary Programs): In reference to the following statements from the listed sections, does this still accurately reflect the process?
- **WREGIS Program Application**, "The WREGIS Administrator and the California Energy Commission (Energy Commission) must approve all change requests and determine budget impacts before any changes or system modifications are implemented." and **Change Requests and System Modification**". System modifications to data fields, including fuel type, fuel source, and eligibility characteristics, as well as adding additional Retirement reason codes or defining custom reports must be approved by the WA and the California Energy Commission."
- Section 12.9- we suggest the following changes to clarify that current and potential WREGIS functionality will permit creation of RECs predating unit registration without the need for state action:
- Automatic creation of retroactive Certificates is not part of the standard functionality of WREGIS. If creation of these Certificates is needed, this process will require action through the Change Control process. A Change Control process for the creation of retroactive Certificates is currently under review, and these Operating Rules and WREGIS functionality will be updated accordingly. WREGIS will not have a time limit for which retroactive Certificate creation will be allowed, however, absent creation of retroactive Certificates pursuant to current WREGIS functionality, as the same may be changed pursuant to the Change Control process, retroactive Certificate creation will only be allowed in WREGIS upon request from a State program or provincial program that requires retroactive Certificate creation. The length of time for which retroactive Certificate creation will be allowed pursuant to such a State or provincial program request will be dictated by the states or provinces that require it.
- Section 15.5.1- we appreciate and support the addition of the "do not rescind" functionality for forward certificate transfers and the explanation.
- Section 16.1- we renew our previous, 2007 comments: Section 16.1 provides that "The system will transfer the certificates from the Account Holder's Active Subaccount to the indicated Retirement Subaccount." In other words, for compliance purposes, one can only move RECs to the retirement subaccount from the active subaccount. Section 6.4 provides: "Account Holders will use th[e Reserve] Subaccount for WREGIS certificates they wish to ... disaggregate." Requiring that compliance retirements may only be from the Active Subaccount, rather than also from

**WREGIS Response:**

The WREGIS Training slides maintain a current count and are posted for public viewing on [www.wregis.org](http://www.wregis.org).

The comment is accepted. The California Energy Commission is no longer a party to the Change Control Contract. The reference to the CEC will be deleted.

WREGIS prefers to have the rules reflect current functionality rather than waiting for possible changes. WREGIS accepts the change to the second to last line.

WREGIS appreciates the importance of this issue to PacifiCorp and are glad that the current functionality provides value.

The section in question is not intended to provide policy guidance; rather, it reflects the functional restrictions in the system itself. The system cannot disaggregate certificates. WREGIS Staff would welcome a change control and policy discussion to look at possible solutions to this issue.

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the reserve subaccount to which RECs may have been moved and partially disaggregated, prohibits stripping out and selling off all non-RPS-required components of the REC before using the same for compliance. This requirement takes a policy position- that only "Whole Certificates" may be used for RPS compliance, It is possible that future GHG/RPS compliance regimes would involve moving a WREGIS Certificate into the Reserve Subaccount for stripping the GHG compliance attributes, for retirement of those, and moving whatever is "left" of the WREGIS REC to the Retirement Subaccount for another program. RECs could be used-in whole or in part- for compliance with many different statutory schemes, not all of which may require the whole REC. Therefore, section 16.1 should provide that retirements can be out of the "Active or Reserve Subaccount". Otherwise, WREGIS will not be able to serve the wide range of policy options that are currently being debated in each of the Western states.

**Kristie Sharp/Jeremy D. Weinstein - PacifiCorp**

**Xcel Energy:**

**The page numbers referred to below are based on the Sept 2010 red-lined version of the WREGIS Operating Rules:**

- Page 4, definition of conversion: Add “and the approval of the WREGIS Committee” at the end of the second sentence.
- Page 6, definition of QRE: Are there any differences between the QRE guidelines established in Appendix D and the QRE guidelines posted on [www.wregis.org](http://www.wregis.org)?
- Page 12, Section 5.3: I know this is subject to change, but I would recommend a sentence be added to this section that states, “Once a generator is approved by the WREGIS Administrator, generation data can be uploaded by the QRE. No generation prior to the generation being accepted in the current certificate cycle will be accepted for upload.”
- Page 29, Section 8.1: Does the WREGIS Administrator have the authority to change the verification documentation that is required? It might be beneficial to add an Appendix to the Operating Rules listing the verification documentation.
- Page 30, Section 9.4.2: Is it a technical restriction that a negative Certificate adjustment can only be made to the current cycle of Certificates? If so, I would like to explore the alternatives for changing this before incorporating it into the Rules.
- Page 31, Section 9.6: Would it be possible to add a sentence to the second paragraph to clarify that these requirements do not apply to Classes I and J?

**WREGIS Response:**

WREGIS accepts this comment.

Appendix D is an Interface Control Document. The guidelines on [www.wregis.org](http://www.wregis.org) outline what the WREGIS Administrator requires in order to qualify an entity to report.

WREGIS agrees with the general content of this comment and will craft language describing the applicable constraints.

Yes, the WREGIS Administrator prefers to leave the verification documents more fluid, due to the variety of documentation available to our Generators.

Yes; the WREGIS Administrator prefers to have the rules reflect current functionality rather than waiting for possible changes.

WREGIS agrees with the general content of this comment and will craft language.

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- Page 31, Section 9.7: Perhaps this section could be expanded to include the minimum reporting frequencies for all classes as well as the notification of the automatic reminder when these reporting frequencies are not met.
- Page 33, Section 9.8.3.2: Does the sentence regarding “demonstration projects” apply only to solar thermal or all project types? What is the definition of “demonstration projects”.
- Page 41, Section 12.4: Is this section applicable to all classes?
- Page 43, Section 13.1: To be consistent with the language accepted regarding simultaneous registration, I suggest the following revision to the second sentence: “If the Certificates have already been transferred into another Account, Account Holders who have received the Certificate from WREGIS will be notified of the error on the Certificate and the ~~Account of the Account Holder~~ associated with the Generating Unit that issued the inaccurate Certificates may be placed into Inactive status.”
- Page 43, Section 13.1: How would the Generating Unit (or Account) be re-activated, once inactivated?
- Page 52, Section 16.2: Why was the time period for a withdrawal request decreased from 12 months to 3 months?
- Page 55, Section 24.1: “Failure to do so in a timely manner will result in a loss of certificates.” What is the definition of “timely” in this sentence?
- Page 56, Section 24.2: To be consistent with the language accepted regarding simultaneous registration, I suggest the following revision to the first paragraph: “If the characteristics of a Generating Unit significantly change and these changes are not reported to WREGIS in an update, or if inaccurate data is submitted, resulting in inaccurate Generating Unit characteristic data being displayed on a WREGIS Certificate, the WREGIS Administrator shall have the right but not the duty to place the associated ~~Account~~ Generator on Inactive status resulting in suspension of generation logging and Certificate creation.”
- Appendix B-3: I suggest the following addition (in italics) to the last paragraph (#3): “if specification of a heat rate is required *by the Account Holder’s State, Provincial or other regulatory authority,.....*”

WREGIS agrees with the general content of this comment and will craft language.

The sentence would apply to any demonstration project. WREGIS will add a definition of such projects.

WREGIS agrees with the general content of this comment and will craft language to clarify.

WREGIS accepts this comment.

WREGIS agrees with the direction of this comment and will craft language.

After discussion with the WREGIS Committee, a provision allowing for a regulatory request will be crafted that would allow for exceptions.

Due to system functionality, the definition will depend upon when the generator goes into suspension-more specificity is not possible on the timeline.

WREGIS accepts this comment.

WREGIS agrees with this comment, but would also add “or is deemed necessary by WREGIS to determine methodological

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<p><b>Kari Chilcott Clark - Xcel Energy</b></p>	<p>integrity,”</p>
<p><b>Center for Resource Solutions</b></p> <ul style="list-style-type: none"> <li>Section 5.3.2 - The edited text states “If any of the characteristics of the Generating Unit(s) change, the eligibility indicator will be cleared for ALL state, provincial and voluntary programs until the WREGIS Administrator is able to verify and re-establish the eligibility claim.” CRS recommends that instead the WREGIS Administrator inform the program administrators (state, provincial and voluntary) of the change and allow a reasonable period of time, within the window between the period of generation and the time of certificate issuance (perhaps 30-60 days) for the program administrators to inform the WREGIS Administrator if the eligibility should be removed. By adopting the proposal as written, some Generating Units may lose eligibility for changes to their characteristics that are not relevant to their eligibility(ies) and the resultant certificates may lose their compliance value.</li> <li>Section 5.3.5 - CRS suggests that if the WREGIS Administrator authorizes the simultaneous registration of Generating Units that all state, provincial and voluntary programs that have approved that generator be informed.</li> <li>Section 5.3.7 - CRS suggests that WREGIS allow prior period adjustments after transfer for a reasonable period of time.</li> <li>The provision that fractional MWhs left in the generation activity log be forfeited may have adverse impacts on small scale generators. CRS suggests that WREGIS seek input from small scale generators and aggregators to explore whether an alternate mechanism for small scale generators, such as transferring fractional MWh from their activity log to the new account if authorized by both the old and new account holders, would better meet their needs.</li> <li>Section 9.3.3 - CRS suggests that WREGIS provide more detail on the process by which program administrators shall inform WREGIS of approved exceptions to the ANSI-12 standard.</li> <li>Section 9.4.2- CRS suggests that for prior period adjustments, the WREGIS Administrator make the adjustment so that new certificates match the vintage of the period subject to the adjustment, and if certificates are subtracted, the WREGIS Administrator make the deduction by removing the certificates in the active subaccount that most closely match the period of adjustment. For example, if the period of adjustment is November 2009, the WREGIS Administrator would first deduct certificates from the Active Subaccount that represented generation in November 2009. If no such certificates were available, then the Administrator would deduct newer</li> </ul>	<p><b>WREGIS Response:</b></p> <p>This is a functionality issue, not a policy one. Any change to the functionality would require going through the Change Control process.</p> <p>WREGIS accepts this comment and will add language to this item.</p> <p>The system functionality does not allow such adjustments at present. Changes to the system functionality would need to go through the Change Control process.</p> <p>The system functionality does not allow such adjustments at present. Changes to the system functionality would need to go through the Change Control process.</p> <p>WREGIS accepts this comment and will add language to this item.</p> <p>The system functionality does not allow such adjustments at present. Changes to the system functionality would need to go through the Change Control process.</p>

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certificates, in order of temporal proximity to the period of adjustment.

- Section 12.9 - CRS urges WREGIS to not include any language or guidance with regard to retro active certificate creation until after the SAC and WREGIS Committee have more fully evaluated the proposals set forth to allow for this functionality. While CRS generally supports the adoption of this functionality, CRS would like any such process to include the requirement that the retro active certificates undergo a verification to assure that those certificates were not already transacted or used for compliance in state, provincial or voluntary programs. CRS suggests that WREGIS develop a process for this verification, including how it will coordinate with state, provincial and voluntary programs for verification, and identify the related costs, before adjusting the Operating Rules.
- Section 16.2 - CRS requests further explanation for the suggestion that the time limit for requesting withdrawal from a retirement account be reduced to 3 months. As many state, provincial and voluntary compliance programs have annual (or longer) compliance verification requirements, reducing the period to 3 months may have unexpected negative impacts on account holders participating in such programs.
- Section 20 - CRS requests further explanation of why the serial number look-up function is being restricted to program administrators.
- Section 24.1 - CRS suggests that if certificate issuance is suspended due to lack of timely response, the certificates that are withheld may be issued in the future if the generator does supply the necessary information.

**Jennifer Martin - Center for Resource Solutions**

WREGIS prefers to have the rules reflect current functionality rather than waiting for possible changes. WREGIS Staff will continue to examine this issue in the Change Control process.

After discussion with the WREGIS Committee, a provision allowing for a regulatory request will be crafted that would allow for exceptions.

This item was changed to reflect current system functionality. At present, this functionality is only available to program administrators.

The system functionality does not allow this at present. Changes to the system functionality would need to go through the Change Control process.

**Bonneville Power Association:**

- 1) 9.2.2 - should be 360 kW not 360kWh
- 2) The defined term "Customer sited Distributed Generation" is not capitalized in Appendix F
- 3) 12.9 proposed changes eliminate the requirement for an attestation that retroactive RECs have not already been sold. Did WREGIS really intend to eliminate this requirement? (suggest that it be retained)
- 4) 24.5.1 Please provide a citation to the deadline in section 24.5.1 or provide the deadline in 24.5.1.
- 5) Page 62 – Appendix B-2 under Biomass, sub heading Biodiesel 3<sup>rd</sup> section starts: "Derived from Derived from MSW conversion..."

**WREGIS Response:**

WREGIS accepts this comment

WREGIS accepts this comment

Specifics of the verification process were removed to allow fluidity if such a request is made.

WREGIS will add a citation.

WREGIS accepts this comment.

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6) Appendix F - Background

4<sup>th</sup> sentence – suggested change - “In addition, due to software constraints, it is impossible to register a system smaller than ~~that~~ 1 kW in WREGIS as a standalone unit.”

7) There are some issues with the page numbers. Pages 1-30 are fine, then the next page is number ‘26’. The page numbers increase from there up to page 55, then the next page is ‘52’ and the numbers continue up from there. Also the formatting for the page number changes in Appendix D (through the end of the document) as compared to the rest of the document. Once the page numbers are sorted out, it could have an impact on the Table of Contents.

**Jamie Sims - Bonneville Power**

WREGIS accepts this comment.

WREGIS accepts this comment.

**PG&E:**

**Clarification is needed on what characteristics would be evaluated prior to removal of the Eligibility Indicator on WREGIS Certificates.**

5.3.2 WREGIS Interaction with Program Administrators – The paragraph states “If any characteristics of the Generating Unit(s) change, the eligibility indicator will be cleared for All state, provincial and voluntary programs until the WREGIS Administrator is able to verify and re-establish the eligibility claim.” This statement creates the potential for uncertainty as it is unclear what Generating Unit characteristics may trigger the response of clearing the eligibility indicator. In addition, the statement fails to specify who will determine whether such characteristics have changed. PG&E suggests that this be clarified to indicate the type of characteristics of the Generating Unit would be evaluated and by whom (e.g., the WREGIS Administrator?) in order to make such a determination. PG&E also recommends consultation with the applicable program administrator before the eligibility indicator is cleared. In addition, PG&E recommends that notice be provided to the Generating Unit when such action is taken.

**Transferring a generator unit from one account to another should not limit the ability to make prior period adjustments after an account is transferred.**

5.3.7 Changing the Account to Which the Generating Unit is Associated – The following addition is included with this revision: “Once transferred, prior period adjustments cannot be entered.” The previous language, which is now being deleted stated: “When the GU is reassigned to Another Active Subaccount, the GAL, will be transferred to the other Subaccount, and any future prior-period adjustments will automatically be credited or debited to this other Subaccount including generation data which will result in the creation of WREGIS certificates in the future.” The deletion of this sentence and the inclusion of the revision noted above restricts an account holder’s ability to make prior period adjustments after an account is transferred. In addition, it is unclear whether this restriction also limits the new account holder’s ability to change data from open reporting periods (at the time of the transfer) once the transfer is authorized. PG&E recommends against making this change restricting an account holder’s ability to make prior period adjustments.

**If a prior period adjustment results in a reduction in certificates from an earlier**

**WREGIS Response:**

Generating Characteristics are those to which eligibility attaches, primarily fuel type. These changes would be triggered upon request by the AH or following an audit or similar proceeding by the WREGIS Staff if a mistake is discovered. The indicator would be automatically cleared, as it would if the program administrator makes changes to their upload. The AH is notified by the system when the indicator is removed.

The change is designed to reflect the reality of system functionality, as the prior rule was not an accurate representation. Changes to the system functionality would need to go through the Change Control process.

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**period, every effort should be made to reflect that adjustment from any available certificates corresponding to that earlier period, rather than from a certificate vintage that occurs simultaneous with the adjustment.**

4.2 Prior Period Adjustments – The following addition is included with this revision – “If Certificates are subtracted, the number will be subtracted off of the Certificate vintage that occurs simultaneously with the adjustment.” This results in shifting of Certificates from earlier compliance periods to later periods, which could create compliance problems if there are restrictions around the use of Certificates of a particular vintage to meet compliance requirements. For example, under the proposed modification, when correcting an excess of issued 2009 certificates in 2011, the excess will remain in 2009 and the certificates in 2011 will be reduced by an equivalent amount. If the account holder had more than enough Certificates in 2009 to meet compliance requirements, but only the minimum required in 2011, and the account holder is not allowed to use 2009 Certificates to meet 2011 requirements, this shifting of Certificates by the WREGIS system could create a compliance gap. Consequently, despite careful RPS planning, a retail seller could face an unexpected shortfall in a year in which certificates are withheld in order to balance an excess made in a previous year. PG&E recommends this sentence be revised as follows: “If Certificates are subtracted, the number will be subtracted from an account holder’s Certificates in the following priority order : 1) any available Certificates with the same month and year vintage corresponding to the prior period adjustment, 2) any available Certificates with the same calendar year vintage corresponding to the prior period adjustment, 3) any available Certificates with the following calendar year vintage relative to the prior period adjustment; and 4) any available Certificates with the same vintage that occurs simultaneously with the adjustment. This proposed alternative revision will allow the corrected amounts to more closely correspond to the year in which the generation occurred.

**Changes to the Section 12.9 Retroactive Creation of Certificates should be deferred until WREGIS Committee action on PCR-192.**

12.9 Retroactive Creation of Certificates – There are a number of deletions and revisions to this paragraph. With the PCR-192 Oregon Retro REC Creation currently under review, PG&E recommends postponing revisions to this section until stakeholder review and WREGIS Committee action on PCR-192 is completed.

**The allowable time for withdrawal from a retirement or reserve account should not be reduced from 12 months to 3 months.**

16.2 Withdrawal from a Retirement Account and 18.3 Withdrawal from a Reserve Subaccount. In both sections the time limit for an Account Holder to withdraw certificates for allowable reasons from a Retirement Account or Reserve Subaccount is reduced from 12 months to 3 months. This significantly reduces an account holder’s flexibility to make any such corrections and effectively renders this provision unusable in light of the necessary time for reviewing Certificates or making regulatory, legislative, or programmatic changes. PG&E recommends retaining the existing limited flexibility of 12 months. Note that such retirement account withdrawals can only occur if the retired certificates have not been applied toward a state or provincial program and if the Account Holder can demonstrate that a legitimate error was made

The system functionality does not allow such adjustments at present. Changes to the system functionality would need to go through the Change Control process.

WREGIS prefers to have the rules reflect current functionality rather than waiting for possible changes.

After discussion with the WREGIS Committee, a provision allowing for a regulatory request will be crafted that would allow for exceptions to the Retirement Subaccount withdrawals. Due to the migration of certificates to an outside party, the Reserve Subaccount issue holds many more dangers so WREGIS Staff will be keeping the 3 month limit in place in order to increase the odds

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or regulatory, legislative, or programmatic change occurred that is prompting the withdrawal.

**In two different sections the phrase “loss of certificates” should be replaced with “non-issuance of certificates.”**

9.5 Data Validity Check – PG&E recommends the phrase “loss of certificates” in the new last sentence be replaced with “non-issuance of certificates”. “Loss of certificates” incorrectly implies that certificates already created will be lost. PG&E believes “non-issuance” more appropriately captures the intent of the new sentence.

24.1 Failure to Update Generating Unit Registration Data by Deadline – Several new sentences have been added to this section. PG&E recommends that the phrase “loss of certificates” in the sentence beginning with the words “Failure to do so...” be replaced with “non-issuance of certificates”. PG&E believes “non-issuance” more appropriately captures the intent of the new sentence. “Loss of certificates” incorrectly implies that certificates previously created would certificates will be lost.

**Minor clarifications and typos.**

The definition for “Compatible Registry and Tracking System” and Paragraph 3.1 on WREGIS Administration Staff Roles and Responsibilities. In both sections the term WREGIS Administrator has been replaced with WREGIS Director. WREGIS Administrator is a defined term in the operating rules, while WREGIS Director is not. For the definition of “Compatible Registry and Tracking System,” we recommend using the term “WREGIS Administrator”, which seems to define more accurately the entity responsible for developing the protocol for the compatible registry and tracking system. In addition, the term “WREGIS Administrator” is more consistent with how the role is defined elsewhere (see, e.g., the definition of “Conversion” which explains that the WREGIS Administrator will agree upon the protocol for the compatible tracking system). For the Paragraph 3.1, we recommend either adding a definition of WREGIS Director to the operating rules or referring to the WREGIS charter.

Definition of Renewable – We recommend adding “or voluntary program” after “state or province”.

5.3.6 De- Registering a Generating Unit from WREGIS. Typo correction: Change “with” to “within” in last sentence of first paragraph.

15.4.1 Rescission of Standing Orders – correct typo in second sentence of first paragraph. Sentence should read: “WREGIS will send an automated email.....”

**Bill Reinwald – PG&E**

that Staff can appropriately follow an audit trail.

Due to the fact that functionality will not allow for certificates to be created outside of a set adjustment window, WREGIS Staff believes that loss of certificates is an accurate description.

Due to the fact that functionality will not allow for certificates to be created while a facility is suspended and will not create these certificates at a later date, WREGIS Staff believes that loss of certificates is an accurate description.

WREGIS will add a definition of WREGIS Director. As mentioned in the discussion with the WREGIS Committee on this topic, the WREGIS Director is responsible for maintaining the program and expanding its reach.

WREGIS prefers to have an authoritative entity determine this definition. The WREGIS Committee agreed with Staff.

WREGIS accepts this comment.

WREGIS accepts this comment.

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**Geysers Power Company**

- Page viii, List of Acronyms: I believe that Supplement Energy Payments can also be deleted from this list since SB1036 ended the California Energy Commission’s authority to award these payments in 2008.
- Page 2, Introduction: I suggest that a sentence referencing WREGIS’s Operation, or Go Live, date (June 25, 2007??) be added to this section, perhaps at the beginning of paragraph 3. [Possibly “WREGIS has been tracking renewable generation in the Western Interconnection and creating Certificates since June 25, 2007.”]
- Page 20-23, WREGIS Account Structure: Does the elimination of “500” Retirement Subaccounts, “up to 20” Active Subaccounts, and “up to 10” Export Subaccounts and Reserve Accounts in Section 6 simply make these sections more general, or do they reflect actual changes in the functionality of the software?
- Page 28, Revenue Metering Standards: I suggest that the footnote stating that losses after the metering point are not reflected be modified to include wording similar to “except as required by a Balancing Authority’s metering protocols”.
- Page 29, Revenue Metering Standards: Are these two identical footnotes necessary since the footnote on the previous page provides the same clarification in the introductory paragraph to this section? I recommend deleting these redundant footnotes.
- Page 43, Section 13.2: Please retain “the WREGIS Administrator will notify [the] parties” and initiate a Prior Period Adjustment. As currently revised, the Accountant Holder may not receive notice of a change under 13.1 or 13.2.
- Page 44, Section 14.1: Please add “or Qualified Reporting Entity” after Balancing Authority as some WREGIS (Class B-J) generators do not have a Balancing Authority reporting their meter data.
- Page 50, Section 15.5 (next to last paragraph): Change to read Forward Transfers based on “Certificates created” in a given month, to keep the ‘creation’ concept of WREGIS Certifications consistent throughout this document.
- Page 52, Section 16.2 subsection 2): Demonstrating that something has not happened is often difficult, so I recommend that “can demonstrate” be replaced with “attests” or “attests in writing”.
- Page 54, Section 18.3 subsections 2) and 3): Demonstrating that something

**WREGIS Response:**

Given that this term still appears in WREGIS, Staff prefers to leave intact, but will ask the CEC to consider making a Change Request to remove from WREGIS.

WREGIS accepts this comment.

This change is an effort to make the section more general. Subaccount restrictions can still be found in the Training Slides found at [www.wregis.org](http://www.wregis.org).

WREGIS accepts this comment.

WREGIS accepts this comment.

WREGIS accepts this comment.

WREGIS accepts this comment.

WREGIS accepts this comment.

WREGIS will request a demonstration in the form of documents from regulators or proceedings as proof of “not”.

WREGIS will request a demonstration in

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has not happened is often difficult, so I recommend that “can demonstrate” be replaced with “attests” or “attests in writing”.

- Page 53, Section 18.1: Recommend removing “only” and “continue to” from the second sentence. [The Reserve Subaccount is to be used ~~only~~ in instances where the Renewable Energy Certificates may ~~continue to~~ be used outside of WREGIS.] I have discussed with other Account Holders using the Reserve Subaccount for other purposes, and don’t feel that doing so jeopardizes WREGIS’ charter or credibility.
- Page 55, Section 24.1: Since WREGIS, not the generator, creates Certificates, I suggest that the existing “no Certificates will be created...” be restored [e.g. ...and while suspended, no Certificates will be created for that Generating Unit...].
- Page 60, Appendix B-1: As noted earlier, the California Supplemental Energy Payment program ended in 2008, so both the reference to California Supplemental Energy Payment Received and to California SEP Eligibility can be deleted.
- Page 63, Appendix B-3: I strongly believe that the methodology approved by the State, Provincial, or other regulatory Program Administrator be the requirement. If a Generating Unit has not received Program Administrator approval, then the alternative of an engineer’s report to WREGIS seems appropriate. However, as drafted in this Appendix it appears that a State Program Administrator could approve a methodology, without requiring an engineer’s report, that WREGIS might then not find acceptable for tracking Renewable Attributes for use in that state/jurisdiction. WREGIS, rightfully, may specify the necessary data and format that the Generating Unit uses to reports its monthly data. Ideally, I would revise the first paragraph of this Appendix to read something similar to “If the State/Provincial Program Administrator did not approve a methodology for calculating the monthly renewable electricity produced at a Multi-Fuel Generating Unit, the Account Holder must submit to the WREGIS Administrator a report prepared by a licensed engineer documenting such a methodology for that Generating Unit. Following the WREGIS Administrator’s review and acceptance of such a report’s methodology, the Multi-Fuel Generating Unit’s Account Holder will be eligible to have WREGIS Certificates issued for the Generating Unit.”

**Dean Cooley – Geyser Power Company**

the form of documents from the listed counterparty(ies) as proof of “not”.

WREGIS accepts this comment.

WREGIS accepts this comment.

WREGIS appreciates this comment and will request that the CEC look into submitting a Change Request to remove this item from the system.

It is not WREGIS’s intention to undo the work of any State, Provincial, or other regulatory Program Administrator, but to ensure that splits between renewable and non-renewable fuels represent a realistic picture of generation attributes of generation produced by a multi-fuel generator. Also, many of the units registering may not actually go to a Program Administrator until after the unit is registered in WREGIS. Given our experience to date, it is unlikely to encounter a multi-fuel generator without an engineering document, due to operating needs on the part of the generator.