

## WREGIS - Change Control

Change Control & Issues Request Form						
<b>Organization:</b> Oregon Dept. of Energy (ODOE)	<b>Requested by:</b> Kip Pheil Updated by Michael Schopf	<b>Date Requested:</b> 27 September 2010 Updated – 3 December 2010				
<b>Phone number:</b> 503-373-2295	<b>E-mail address:</b> michael.schopf@odoe.state.or.us	<b>Priority: Please circle</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">Urgent</td> <td style="text-align: center;">((High))</td> </tr> <tr> <td style="text-align: center;">Medium</td> <td style="text-align: center;">Low</td> </tr> </table>	Urgent	((High))	Medium	Low
Urgent	((High))					
Medium	Low					
<b>Title:</b> UPDATED Oregon RPS retro-REC Creation.		<b>Target date: Please explain</b> February 2010 - decide 31 March 2011 - implement (See Rational/Benefit/Need)				
<b>Description:</b> <p>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.</p> <p>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.</p> <p>Oregon Department of Energy (ODOE) is compiling a spreadsheet of affected GU's including the amounts and vintages of Oregon QE that is "stranded" (has not been associated with WREGIS-issued REC's). As appropriate, this information will be shared with WREGIS staff to determine the exact scope of Oregon's stranded generation.</p> <p>Actions Requested:</p> <ol style="list-style-type: none"> <li>1. Authorize retroactive creation of Oregon eligible RECs for those GU's identified by ODOE as having produced stranded generation.</li> <li>2. Prepare cost estimate(s), as necessary, for the retroactive creation of RECs as described above.</li> </ol>						
<b>Rational/Benefit/Need:</b> <p>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 tracking system. Oregon did not create an alternative system and has a strong bias to rely on WREGIS for all REC accounting.</p> <p>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</p>						

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cost, WREGIS-issued REC output for all QE which is eligible for the Oregon RPS will be available for compliance.

A WREGIS Committee decision in the first quarter of 2011 will assure Oregon RPS participants that the WREGIS system will continue to be the exclusive REC tracking system for the Oregon RPS.

**Consequences of not Implementing Change:**

An advisory committee has met five times since July 2010 to review possible Oregon RPS rulemaking. Recently, 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 rulemaking cannot be known at this time. If no solution is found, it seems likely a change in statute would be proposed during the 2011 Oregon legislative session.

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

**Attachments/References:**

**Signature:**

**Date:**

**Please send to SAC:**

**Contact Person  
Address**

**Phone number**

**E-Mail**