

Change Request Form

Project Issue Request ID:	Requested by: WREGIS E-tag Committee	Type of Change: Overall Application change	Date Requested: Priority: High
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Title: Load and transfer the proof of delivery data (PDD) with WREGIS Certificates.

Description:

The WREGIS E-tag committee seeks to expand WREGIS functionality that tracks the proof of energy delivery which meets RPS requirements of various jurisdictions within WECC. The request is to:

- 1) modify both WREGIS and the WIT query to allow the proof of delivery data (PDD) to go into the WREGIS account of the “entity importing the energy into the jurisdiction”, which could be but is not always the LSE on the E-tag.
- 2) allow the same proof of delivery data (PDD) to be associated with a WREGIS certificate prior to the retirement account and;
- 3) allow that same proof of delivery data (PDD) to be transferred with the WREGIS certificate to other entities and ultimately to a retirement account.

There are many lines in a physical path on an E-tag. Each line contains a single PSE and may be associated with up to 10 Miscellaneous Token fields. The PSE on the first line is also called the Source PSE and the PSE on the last line is also called the LSE (Load serving Entity). The current WIT query assumes that the LSE is the importing entity which is often, but not always the case. This change request proposes that the true importing entity can be designated on the E-tag by placing the “RPS_ID” token(s) on the line of the E-tag where the importing Entity is the PSE. The Proof of Delivery data would be then pulled into the WREGIS account of the Importer.

An entity importing into the jurisdiction who wishes to be recognized in WREGIS as the “Importing PSE”, would need to be a registered WREGIS account holder. WIT query will determine which PSE is the “Importing PSE” by looking for a Miscellaneous token field which contains “RPS_ID”. The “Importing PSE” is the PSE on the line of the E-tag associated with the “RPS_ID”. The “RPS_ID” token can appear in any or all of the 10 Miscellaneous tokens associated with that line of the E-tag but can NOT appear in any miscellaneous token field which is associated with any other line of the e-tag physical path.

These rules ensure that E-tag data can only be imported into the WREGIS account of an entity that actually appears on the e-tag. This also ensures that each e-tag can only be imported into the WREGIS account of a single entity, one single time. Any e-tag which contains an RPS_ID Miscellaneous token on more than one line of the physical path of the e-tag would not be imported into WREGIS because the WIT query could not determine which entity should receive the data.

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Similar to today, the WREGIS proof of delivery data would come from an E-tag and would consist of the following fields:

- 1) NERC Tag ID
- 2) Start Date
- 3) Stop Date
- 4) Generator Name (aka Source, first Point of Receipt POR)
- 5) Load (aka Sink, Last Point of Delivery POD)
- 6) Generator Control Area
- 7) **Importing PSE** ** This is the only change from today's functionality
- 8) Total MWh on Tag for the time period (currently a month)
- 9) Miscellaneous Token Field RPS_ID (concatenation of up to 10 Miscellaneous token values all associated with the same line of the physical path)

**The proposal is to revise the existing "Load Serving Entity (PSE Sink)" and replace it instead, with the PSE from the line in the Etag which contains "RPS_ID" in the Miscellaneous Token(s). If the Miscellaneous token is placed in last line of the etag, then this field would still contain the LSE but if the Miscellaneous token is placed on a line higher in the etag, then the PSE from that line would appear in this field.

All this proof of delivery Data would be provided by the WIT query and would be imported into the WREGIS proof of delivery account of the "Importing PSE".

The WREGIS Proof of Delivery account holder (Importing PSE), should be able to associate all or a portion of the MWH's of that Proof of Delivery Data (PDD) with a WREGIS certificate or certificates. Once the PDD is associated with a Certificate, an entity should be able select a certificate and view all PDD associated with it. An Entity should also be able to select a NERC Tag ID and see all the Certificates that are associated with it and how many MW's remain unassociated.

After a Certificate has been associated with PDD, an entity should still be able to transfer the certificate to another entity. Once that certificate with PDD is transferred to another entity or ultimately retired, then those entities should also be able to see the PDD data which has been associated with that Certificate. The PDD data can no longer be unassociated from that Certificate once the certificate has been transferred with the PDD to another Entity. The PDD data will remain with the certificate for the life of the certificate.

This is a request for a pricing quote, design and implementation plan from OATI for the required WIT query changes and from APX for the required WREGIS query changes.

Appendix A contains the proposed changes to the WIT query.

Appendix B is reserved for comments and feedback on this proposal

Appendix C contains the previously presented outline of this revised proposal

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APX Response:

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OATI Response:

Reason for Change: The current functionality does not support the transfer of valid proof of delivery from the deliverer/importer to the RPS regulated LSE because the RPS LSE is not always equal to the LSE on a NERC tag.

Deliverables: Pricing quote, with a design and implementation plan to demonstrate feasibility

Estimate for Scheduled Release: To be determined.

Cost Impact:

Risk & Issues Involved:

-

External Impacts:

-

Attachments/References:

None

Approvals

APX:

Date:

CEC:

Date:

Notes:

Appendix A

Description of Existing WIT Query

The following description is from Mark Neilson of OATI.

On the 7th of each month, a WIT automated process runs a data query against all schedules from the previous month. This query retrieves schedules meeting the following criteria:

- (1) Schedules matching a WECC approved LSE list. LSEs will be identified using NERC PSE Codes.
- (2) Schedules with a start/stop date and time within the previous calendar month in the UTC time zone.
- (3) Schedules with RPS ID numbers. These Values are found on the E-Tag Physical Path LSE row with Misc Info Tokens of "RPS_ID"

All schedules retrieved from the aforementioned query will be properly formatted as an EIDE message and sent to the WREGIS system. The following data elements will be provided for each schedule:

- Schedule name (E-Tag Code)
- Schedule net MWh value for query period
- Start Date/Time of energy flow during the query period
- Stop Date/Time of energy flow during the query period
- Generating facility NERC registered "Source Point"
- Generator Balancing Area (GCA)
- Generation Providing Entity (GPE)
- Load facility NERC registered "Sink Point"
- Sink Balancing Area (LCA)
- Load Serving Entity (LSE)
- Token Value(s) (RPS_IDs)

Proposed changes to WIT Query are **Underlined in RED** ~~Deleted in Strikethrough~~

On the 7th of each month, a WIT automated process runs a data query against all schedules from the previous month. This query retrieves schedules meeting the following criteria:

- (1) Schedules matching a WECC approved **PSE** list. **Importing PSE** will be identified using NERC PSE Codes and the following logic:
- (2) Schedules with a start/stop date and time within the previous calendar month in the UTC time zone.
- (3) Schedules with RPS ID numbers. These Values are found on the E-Tag Physical Path in the Misc Info Tokens of "RPS_ID". These can be found on any line of the E-tag but only 1 line per E-tag. Note, consistent with the current functionality, 1 line may contain up to 10 "RPS_ID" values and all 10 of these values should be concatenated together and sent to the WREGIS system as a single token. If the "RPS_ID" Miscellaneous token is found on more than 1 line of the physical path, then the tag is excluded.
- (4) Once the "RPS_ID" line is identified then the PSE on that line is deemed to be the importing Entity.

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All schedules retrieved from the aforementioned query will be properly formatted as an EIDE message and sent to the WREGIS system. The following data elements will be provided for each schedule:

- Schedule name (E-Tag Code)
- Schedule net MWh value for query period
- Start Date/Time of energy flow during the query period
- Stop Date/Time of energy flow during the query period
- Generating facility NERC registered “Source Point”
- Generator Balancing Area (GCA)
- ~~Generation Providing Entity (GPE)~~
- Load facility NERC registered “Sink Point”
- Sink Balancing Area (LCA)
- ~~Load Serving Entity (LSE)~~
- Token Value(s) (RPS_IDs)
- **Importing Entity (PSE from line of etag with “RPS ID” in the Miscellaneous token)**

Confidentiality: With these proposed changes only confidential data belonging to an importer will be uploaded into that importers WREGIS account, no confidential data belonging to any other third party will be uploaded. At this point, the only transfer of confidential E-Tag data becomes the transfer of the importer’s confidential E-Tag data. The decision to transfer this data would be a commercial decision by the data’s owner and will be governed by any underlying commercial contract that the importer has with respect to the transfer of WREGIS certificates.

<http://ecfr.gpoaccess.gov/cgi/t/text/text->

[idx?c=ecfr;sid=843079b229d3bd54b620ba60bd01ebdb;rgn=div5;view=text;node=18%3A1.0.1.2.25;idno=18;cc=ecfr#18:1.0.1.2.25.0.23.7](http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=843079b229d3bd54b620ba60bd01ebdb;rgn=div5;view=text;node=18%3A1.0.1.2.25;idno=18;cc=ecfr#18:1.0.1.2.25.0.23.7)

Appendix B
Comments on Proposal

Comments and feedback on the previous proposal have been removed, as this is a significant departure from the original proposal

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Appendix C

Function	Existing WIT Query	Data availability	Notes	Proposed WIT Query	Data availability	Notes
Schedule Identifier	E-Tag Code	public		E-Tag Code	public	
Volume (month)	Schedule net MWh value for the Month	public		Schedule net MWh value for the Month	public	
Volume (month)	Start Date/Time of energy flow for the Month	public		Start Date/Time of energy flow for the Month	public	
Volume (month)	Stop Date/Time of energy flow for the Month	public		Stop Date/Time of energy flow for the Month	public	
Generation Integration Point <i>(not necessarily the generation)</i>	Generating facility NERC registered "Source Point"	public		Generating facility NERC registered "Source Point"	public	
Generation Region	Generator Balancing Area (GCA)	public		Generator Balancing Area (GCA)	public	
	Generation Providing Entity (GPE)	private				remove - not needed
Consumption Point	Load facility NERC registered "Sink Point"	public		Load facility NERC registered "Sink Point"	public	
Consumption Region	Sink Balancing Area (LCA)	public		Sink Balancing Area (LCA)	public	
IMPORTER	Load Serving Entity (LSE)	private (public at importer discretion) - data can't be passed from retirement acct	Always Last PSE on physical path of NERC tag	Purchasing Selling Entity (PSE)	private (public at importer discretion)	PSE in physical path on line for Token value - RPS ID(s)
RPS Facility	Token value – RPS ID(s)	private (public at importer discretion) - data can't be passed from retirement acct	Always located on Last of Physical Path of NERC Tag	Token value – RPS ID(s)	private (public at importer discretion)	Located on single line of physical path of NERC tag (populated by importer)

Definitions

public = publicly available field under NERC XXXX

private = confidential to NERC tag (i.e. no FERC based disclosure requirement)

private (public at importer discretion) = confidential to NERC tag however disclosure required if delivery data is to be transferred

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OATI - WIT query changes

Change	Description	Reason
Same	RPS ID will continue to be specified in a MISC TOKEN on the physical path of an e-tag.	
New	Instead of looking for the RPS ID in the MISC TOKEN on the LSE row of the Etag physical path, WIT will look in ALL rows of the physical path to find the RPS_ID Miscellaneous Token.	The e-tag LSE is not always the importer into the jurisdiction. (Note this could still be the last row in the physical path which is the LSE row. This means the system would continue to work unchanged for those entities whose needs are already being met by the current functionality)
New	The RPS ID needs to be on the line in the physical path of the E-tag, as the PSE who is importing the energy into the jurisdiction.	The location of the RPS MISC TOKENS will determine which PSE on the tag to look at and will ensure that the PSE is on the Etag being imported
New	If the RPS ID is found in more than one row of the physical e-tag, the tag data will not be imported into WREGIS.	This will prevent the tag from being imported multiple times into WREGIS.
New	Once the RPS ID is found, the query would look at the PSE on that same row of the Etag to determine which WREGIS account should receive the E-tag data.	This will prevent the tag from being imported into the WREGIS account of someone who does not appear on the e-tag.
New	All the same fields/data elements would continue to be returned to the WREGIS system except the Generating PSE and Load PSE.	The Generating PSE and LSE are not necessary to meet the proof of deliverability and they are the only fields which are not already disclosed publicly per FERC's orders. (see Electronic Code of Federal Regulations http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=843079b229d3bd54b620ba60bd01ebdb;rgn=div5;view=text;node=18%3A1.0.1.2.25;idno=18;cc=ecfr#18:1.0.1.2.25.0.23.7)
New	1 new additional element will be returned to the WREGIS system, the Importing PSE.	This is the field which determine who's WREGIS account receives the Proof of Delivery Data (PDD)

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Validation

Delivery Test	While it is still considered a desirable outcome for the jurisdictions to provide some validation prior to the import into the WREGIS system, it is not necessary as part of the scope of this change control to have deliverability test	The importing entity has sufficient data to ensure that the proof of delivery is sufficient and would have a contractual financial responsibility to the purchasing entity if it was found to be incorrect.
Importing Entity	Importing Entity would be on the etag in all cases and should be able to view all Etag data imported into their WREGIS account.	
Purchaser of REC with Proof of delivery	Entities purchasing a Certificate with Proof of Delivery should be able to view all the Proof of Delivery Data associated with the Certificate that was transferred to them.	All of this data is already publicly available due to FERC's regulations of Transmission providers. (Etag ID, Schedule Net MW for the query period, Start and Stop date.time of the Energy flow during the period, RPS ID, Generating Balancing Authority (GCA), Generating Source Point, Load Balancing Authority (LCA) and Load Sink Point.
Regulator	Upon retirement the same Proof of Delivery Data that the purchaser of the REC received would be visible to the regulator.	

Match and Transfer

The Use case as previously defined would still be largely the same except for the removal of the Delivery test.

For the matching process it is anticipated that an entity would be able to filter on an RPS ID and see all the Certificates on one side of the screen and all etag data with that RPS ID on the other side of the screen.

An Entity should be able to select, one, many or all of the etag data and be able to associate it with one, many or all of the certificates with the same RPS ID by just selecting, dragging and dropping.

Once a certificate with associated Proof of Delivery Data is transferred to another entity then that Proof of Delivery data cannot be removed from the certificate and cannot be associated with any other certificate.

The entity who transferred the certificate (the Transferor) should still be able to view/report on a record of the certificate, the proof of delivery data and who it was transferred too (The Transferee).

The entity who received the certificate (The Transferee) should also be able to view/report on a record of the certificate, the proof of delivery data and who it was transferred from (The Transferor).

The entity who received the certificate (Transferee) should not be able to alter the certificate or the proof of delivery data but should be able to transfer it to another entity. Then they become the Transferor and the logic continues the same as above.