



September 1, 2022

Andrea Coon

Western Renewable Energy Generation Information System (WREGIS)

155 North 400 West, Suite 200

Salt Lake City, Utah 84103

RE: COMMENTS OF CENTER FOR RESOURCE SOLUTIONS (CRS) ON WREGIS PROPOSED CHANGES TO TERMS OF USE AND OPERATING RULES

Dear Ms. Coon:

CRS appreciates this opportunity to submit comments on the July 29, 2022 WREGIS Proposed Changes to Operating Rules.

BACKGROUND ON CRS AND GREEN-E®

CRS is a 501(c)(3) nonprofit organization that creates policy and market solutions to advance sustainable energy. CRS provides technical guidance to policymakers and regulators at different levels on renewable energy policy design, accounting, tracking and verification, market interactions, and consumer protection. CRS also administers the Green-e® programs. For over 20 years, Green-e® has been the leading independent certification for voluntary renewable electricity products in North America. In 2020, Green-e® certified retail sales of nearly 90 million megawatt-hours (MWh), serving over 1.4 million retail purchasers of Green-e® certified renewable energy, including over 104,000 businesses.¹

COMMENTS ON PROPOSED CHANGES TO WREGIS OPERATING RULES

1. Please clarify whether Active Generator Reports will be publicly available. Sec. 2 Definition of Terms indicate the Active Generator Reports are publicly available, yet Section 19.2 Public Reports is shown as stricken.

¹ See the 2021 (2020 Data) Green-e® Verification Report here for more information: <https://resource-solutions.org/g2021/>.

2. Sec. 5 states: “Any entity that wishes to hold, create, or use Certificates recognized in WREGIS must establish an Organization.” Please provide clarification regarding how state and voluntary programs can use WREGIS for program administration.

Per these proposed changes, it is unclear whether and how state renewable portfolio standard (RPS) program, other state regulatory program (e.g. clean fuels program), and voluntary program (e.g. Green-e® program) administrators have the ability to perform annual verification audits or reviews or to compile data for compliance reports.

3. Regarding the removal of Sec. 19.2 and the proposed changes to Sec. 18.2, we recommend that WREGIS Staff keep public reports available with limited static information for privacy protection (e.g. generator facility name, generator located state, tracking system ID, nameplate capacity, resource type, first operational date, etc.) to ensure market transparency.

Voluntary programs such as the Green-e® program rely on publicly available reports and information to verify that generating facilities are registered in a tracking system, for example. Auditors that perform Green-e® verification annually also rely on publicly available reports for certain verification procedures. If an account with WREGIS is required to access such information, this will hinder market transparency.

4. Regarding Sec. 6.2, please clarify whether an Organization has the ability to create multiple retirement accounts. We generally recommend that Organizations have the ability to create multiple retirement accounts.

Multiple retirement accounts can be used by Organizations to keep track of retirements for different retirement years, products, and programs, e.g. a separate retirement account for a state RPS program and for voluntary sales. In particular, multiple retirement accounts would support the Green-e® program’s verification process.

5. The final paragraph in Sec. 3.1, is shown as stricken. Please explain why this information about governance has been removed, whether it is included in other governing documents, and whether it signifies a change in governance, e.g. the role of the Stakeholder Advisory Committee (SAC) in electing the WREGIS Committee.

If this information is not included in other governing documents, and there is no change in governance, we recommend that this paragraph not be stricken. We request an opportunity to discuss any proposed changes in governance with the SAC.

6. We recommend the following revision to proposed text in Sec. 18.2.1: “for compliance or voluntary purposes.”

7. Appendices B-1 through B-3 are shown as stricken. We recommend keeping these data tables and updating them for the transition to MRETS software.
8. Consistent with previous comments and program change requests (PCRs) submitted, CRS requests implementation of a specific Green-e[®] program retirement reason with reporting year drop down as well as an additional details field.

These functions are important to support verification for the Green-e[®] certification program. We would be happy to provide additional details and/or submit additional materials to support this request.

Please let me know if we can provide any further information or answer any other questions.

Sincerely,

_____/s/____

Judy Chen

Manager, Certification Programs