

From: [Langenberger, Robert](#)
To: [wregiscomment](#)
Cc: [Langenberger, Robert](#); [Wicks, Parker](#); [Craig, Cora](#)
Subject: WREGIS Operating Rule Changes
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Hello WREGIS,

I have reviewed the proposed WREGIS operating rule changes and submit the following comments. I realize the comments are a couple of days past the August 29, 2022 comment period end, but I hope you will accept them anyway.

1. I have no significant suggested changes to the new operating rules. They look fine. Instead, my are comments are related to a couple processes that are not included directly in the new operating rules (at least I did not see them).
2. Comment 1: With the change in the timeline(s) for issuing RECs, I see a very high probability that generation data that is reported on the same day, from one company, and from multiple generating units may result in RECs for a single vintage being issued and billed in separate months. I encourage WREGIS to consider ways to provide more itemized information on its monthly bills and differentiate the number of RECs being issued for each different REC vintage. It may be otherwise difficult to reconcile reported generation with the billing for issued RECs. For example, generation data submitted on the same day for the same vintage may follow different paths and timelines for issuance. RECs that do not fail feasibility will be issued sooner than RECs that may require a data validation or a multi-fuel allocations. These timelines may cross monthly boundaries. So, to account for this, WAPA requests more detailed billing information be included on monthly bills.
3. Comment 2: There is no reference to time lines for WREGIS to perform data validation checks for data that may fail feasibility or for multi-fuel allocations. What are the expected timelines to perform these review tasks assuming there are no issues found with the data? Will this occur within a day, a couple of days, a week, 14 days? If not addressed in the Operating Rules, the expectations should be documented somewhere. Under current rules, data validation checks were finalized in day 75-90. But with the decoupling of timelines from the end of a month, and the shorter time lines for review of generation data and issuance of certificate, it would be beneficial to understand the expected timelines to adjust our data submittal.
4. Comment 3: I don't think the change in login permissions from role-based to permission passed will significantly impact the ability for a 3rd Party to Login to our account and view the number of RECs that have been allocated to them and subsequently transferred to a single Sub-Account or a couple of Sub-Accounts. However, it would help to have more information

on what is meant by function-by-function to make sure. I am guessing one function it to “see and manage sub accounts” and another may be to “see and manage generator information”. Also, will existing organizations need to “reapply” the permissions from the old use model to the new model for each login or will current capabilities be initially transported to the new system?

Overall I think the proposed changes look good.

Thanks for the opportunity.

Bob Langenberger | Power Marketing Advisor

Western Area Power Administration | Rocky Mountain Region

(O) 970.461.7481 | (M) 970-581-2086 | [Langenberger\[at\]wapa.gov](mailto:Langenberger@wapa.gov)

