



Market GHG Allocation and WREGIS Certificates

Discussion resource for the WREGIS Stakeholder Advisory Committee

October 2026

What is the issue?

CAISO and SPP are implementing GHG accounting frameworks for their Western wholesale electricity market offerings that allocate generation attributes from participating resources to retail load to support state GHG reporting. CAISO's Accounting and Reporting (A&R) Approach applies across WEIM and EDAM, while SPP's GHG Tracking & Reporting protocol applies to Markets+. These frameworks include generation that may also be registered and tracked in WREGIS.

These market frameworks can operate in parallel with WREGIS without requiring REC transfers to accompany resource-specific allocations. As a result, generation attributes could be allocated to one entity or residual mix through a market framework while the associated REC is retained or transferred to another entity. Where both are used to support renewable energy or zero-emissions claims, this can create competing claims on the same underlying generation attributes and, under many state and voluntary program rules, double counting. Where market allocation frameworks and REC systems are separately used for different load-based accounting or compliance programs operating in the West, this parallel accounting can create discrepancies between programs and uncertainty about which load-based accounting results and retail electricity use claims are valid.

- The risk can affect state compliance programs, including RPS and CES programs, as well as voluntary programs that rely on RECs to substantiate renewable-energy or emissions claims.
- The issue can arise when generation is allocated on a resource-specific basis to a reporting entity, non-participating balancing authority area (BAA), regional residual mix, or market residual mix while the associated REC is separately retained or sold.
- Both CAISO and SPP have made null power reporting optional. Renewable generation for which the associated REC has been sold may therefore still be allocated and reported as renewable if null power is not reported. Market allocation data may consequently fail to reflect the full volume of null power identifiable through WREGIS certificate data.
- Even if null power reporting were required at the time of market allocation, REC transactions can occur later. Coordination with WREGIS would therefore still be useful to carry allocation information forward with the affected certificates.

The core issue for WREGIS account holders and program administrators is transparency. Without coordination between WREGIS and market operators, WREGIS certificate holders and program administrators may not know whether the generation underlying a certificate has also

been allocated on a resource-specific basis through CAISO or SPP. Without that information, they cannot determine whether that allocation affects the eligibility or use of the certificate under their programs or take any action they consider appropriate.

What is CRS asking for?

CRS is asking the SAC to support a transparency and data-sharing approach, not a change to REC transfer or retirement rules and not a WREGIS policy position on either the CAISO and SPP frameworks or state GHG accounting program or other rules. The approach consists of the following:

1. Ask CAISO and SPP to provide WREGIS with generator-specific market allocation data for WREGIS-registered generators on a monthly basis, with hourly granularity.
2. Create space in the new WREGIS software for fields related to market allocation data as a future roadmap item.
3. Discuss whether and how allocation information should be associated with affected WREGIS certificates.

The purpose would be to make market allocations visible to WREGIS account holders and program administrators so that each state, voluntary program, regulator, or market participant can decide for itself whether and how the information affects REC eligibility, accounting, or reporting. Programs would not need to agree on the implications of an allocation, and WREGIS would not prescribe how the information must be used.

Q&A

How would double counting occur in a real-world scenario?

CAISO's A&R framework, for example, can assign fuel type and emissions data from a WREGIS-registered renewable generator to a reporting entity while RECs are issued for the same generation in WREGIS. If the market allocation is used to report renewable or zero-emissions electricity and the REC is separately retired for another claim, the same generation attributes can be claimed twice.

Example: a Colorado utility owns a wind generator participating in CAISO's A&R framework. The market allocates that wind generation to the Colorado utility's load, but the utility sells the RECs to an Oregon utility, which retires them in WREGIS for its RPS. The market allocation and REC retirement could then support competing claims by two LSEs in two states.

What data would be provided to WREGIS?

For each WREGIS-registered generating unit, CRS proposes a monthly report containing hourly quantities of generation that were bid into the market and allocated on a resource-specific basis to: (1) a reporting entity, including its name; (2) a non-participating BAA, including its name; (3) a GHG-pricing-zone residual mix; (4) a voluntary-climate-region residual mix; or (5) the market residual mix.

The report could summarize, for each generator, total hourly allocated volume during the month by destination. WREGIS should be consulted on the format and transfer method.

What would WREGIS do with that data?

CRS proposes that WREGIS associate or “tag” affected RECs with the relevant CAISO or SPP allocation information so that account holders and program administrators can see it.

If CAISO and SPP data are hourly, how would they be matched to monthly RECs?

The markets could report allocation data monthly with hourly granularity. Hourly allocations can then be aggregated to monthly totals and associated with an equivalent quantity of RECs from the relevant generator.

What would that data look like in WREGIS?

A certificate field could indicate whether the underlying generation was allocated on a resource-specific basis, which market operator made the allocation, and the entity, BAA, or residual mix to which it was allocated. Example: Plant X | July 2025 | CAISO WEIM to PGE.

What changes to WREGIS operations would need to be made?

The new software would need fields capable of storing market-allocation information. Timing may also require consideration: WREGIS currently issues RECs on an ongoing basis, typically about two weeks after generation data are reported or earlier if customer-approved. If allocation data arrive monthly, issuance for generators participating in the relevant markets might need to wait for that data, while other generators could retain the current issuance schedule.

How hard would it be to get the information needed?

CAISO and SPP already possess the underlying allocation information. CRS has been encouraging both market operators to consider providing it to WREGIS. The remaining issues are agreement to share it and the details of format, timing, and transfer.

Would this involve or amount to tracking GHG emissions in WREGIS?

No. The proposal is not for WREGIS to track GHG emissions. It is to add information about the market allocation of generation/GHG attributes to affected certificates.

Would this affect policy neutrality for WREGIS?

Under the proposal, WREGIS would receive market data and make relevant information available to account holders and program administrators. It would not determine whether an allocation invalidates a REC or require account holders to take any particular action. Each state or voluntary program could decide whether the information affects eligibility or whether REC distribution should align with market allocations to avoid double counting.

Do REC retirement requirements effectively address the problem, and is this a state policy issue rather than a WREGIS issue?

REC retirement requirements help protect exclusive REC claims, but retirement in REC-based programs does not by itself reveal whether the same underlying generation attributes have also been allocated elsewhere through a market framework.

For example, Green-e and state RPS programs already require REC retirement. If the underlying generation is nevertheless allocated to another entity and used for reporting in another program, there can still be a competing claim. Visibility in WREGIS would allow states and programs to identify the allocation and decide what action, if any, to take.

How would this affect data confidentiality?

This requires further discussion. Generator allocation data could be provided to WREGIS and displayed to the account holders of affected RECs and to program administrators that already receive relevant account or retirement information; the market data would not necessarily need to be published in a public report.

WREGIS-registered generators that already authorize CAISO to act as the Qualified Reporting Entity (QRE) for generation data used for certificate issuance could potentially authorize CAISO to share allocation data as well. Program administrators should be able to see allocation information before or during verification/compliance review.

Is this only relevant to Green-e® or certain other programs?

No. Parallel allocation can affect any account holder or program relying on an affected REC. But the proposal is limited to transparency: Green-e®, state programs, and other users could reach different conclusions about whether a particular allocation constitutes double counting or affects REC eligibility. WREGIS would provide the information and allow each program to apply its own rules.

Recap of Previous WREGIS Discussions

The issue was first raised with the full SAC in November 2024. A smaller group of interested stakeholders was then formed; approximately 34 individuals participated, and the group met twice in April and May 2025.

The group identified important issues but did not reach consensus on several questions:

- Whether WREGIS should request allocation data from CAISO and SPP.
- Whether WREGIS should conduct outreach to generators whose generation is subject to market allocation.
- Whether, and if so how, market allocation information should be reflected on WREGIS certificates.
- Which compliance and voluntary program administrators would need or rely on the information.

Some participants supported greater data transparency and efforts to avoid double counting. At least one state regulator described program rules for RECs associated with EDAM procurements and how those rules could be affected if the underlying generation were allocated

to a different entity through a market framework. At least one participant clearly objected to continuing the discussion; two participants questioned the relevance of the market allocation data to WREGIS account holders, and others raised concerns about the feasibility of tagging RECs with the information.

Functionality for market allocation data was not specifically included in Phase I of the new WREGIS software, and the notes indicate it is not believed to be included in Phase II. Future software roadmap items require SAC support.

Objectives for SAC Discussion

- Evaluate interest in continuing discussion of a request for market allocation data from CAISO and SPP.
- Evaluate interest in adding functionality for market allocation data to the new WREGIS software as a future roadmap item.
- Identify key questions and concerns that should be resolved before moving forward with a data request.
- Identify the steps needed to move forward with (1) a request for allocation data from CAISO and SPP and/or (2) an evaluation of the WREGIS functionality needed to incorporate that information.

Additional Resources

- CRS letter to the WREGIS SAC, November 7, 2024.
- SPP blog post: [“SPP launches greenhouse gas tracking and reporting program with Singularity Energy.”](#)
- CAISO Energy Matters blog post: [“Making energy emissions more transparent: CAISO’s Accounting and Reporting Approach.”](#)
- CRS blog post: [“Avoiding Double Counting in Clean Energy: The West Needs Better Coordination Between Electricity Markets and REC Tracking Systems.”](#)
- CRS policy brief: [“Double-Counting Risks in New Market Accounting Frameworks for State Clean Energy Programs.”](#)
- CRS background report: [“GHG Allocation and RECs in Western Markets.”](#)
- Spees, K. et al. (April 29, 2025), [Enhancing Greenhouse Gas Accounting and Dispatch Support in the CAISO and SPP Markets+](#), The Brattle Group, prepared for Western Resource Advocates and Interwest Energy Alliance, pp. 30-33.