



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE
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August 28, 2025

VIA ELECTRONIC FILING

Melanie Frye
WECC President and CEO
Western Electric Coordinating Council

Andrea Coon
WREGIS Director
Western Renewable Energy Generation Information System (WREGIS)

Dear Ms. Frye and Ms. Coon,

The Washington Energy Policy Office appreciates the opportunity to comment on the proposed [future WREGIS structure](#) and development of a new tracking renewable energy tracking system.

The Washington Energy Policy Office, within the Washington State Department of Commerce, is the WREGIS program administrator for Washington's renewable and clean electricity standards and designates the renewable energy system tracking system for use under those standards. The Office regularly uses and oversees the Western Renewable Energy Generation Information System (WREGIS) to track renewable energy credits (RECs) and has chaired the WREGIS Committee over the past several years. The Office has greatly appreciated working with WREGIS and WECC staff and have found staff capable, competent, trustworthy, and stakeholder-oriented over the last several years.

Renewable energy tracking systems are the crucial hardware that make achieving state climate laws and corporate sustainability initiatives possible. Washington state would not be able to track renewable energy procurements under its renewable portfolio standard, the Energy Independence Act (EIA, I-937) or 100% clean electricity law, the Clean Energy Transformation Act (CETA), without a renewable energy tracking system. Tracking systems impact policy and regulatory decisions, and the costs of these systems are borne by their users and in most cases trickle down to ratepayers. For these reasons, and many others, renewable energy tracking systems are very important to state energy offices and regulators.

The Office recognizes the need for WREGIS and WECC to move quickly to issue an RFP for a software provider to create a new renewable energy tracking system, following CleanCounts decision not to renew its contract with WECC. Not having a renewable energy tracking system would be catastrophic to our state and other entities who rely on these systems to uphold clean energy laws and corporate climate commitments. The Office thanks WREGIS for presenting a viable plan to avoid this outcome and acting on it.

We commend WREGIS and WECC staff for hosting multiple WREGIS and Stakeholder Advisory Committee meetings and two town halls, along with conducting a customer survey that got nearly 200 responses. We encourage WREGIS to continue to engage with state energy offices, regulators, other users of WREGIS, and the public.

We offer comments below recognizing there will be more opportunities to provide more detailed feedback on governance and software developments.

WREGIS Governance

We support WREGIS being organized as a 501(c)(4) for the reasons stated in the July 15, 2025, WREGIS Future Structure proposal. We further recognize that CleanCounts is organized as a 501(c)4 and believe that WREGIS should be structured similarly.

An open, transparent, and accountable governance framework is critical for ensuring a credible, durable renewable energy accounting and tracking system. From the perspective of a state program administrator, it is crucial that states with renewable or clean energy mandates have representation on the governing board and that each state with clean energy requirements have a position on a formal advisory committee. There are two principal reasons for a strong and explicit role for states in the governance framework. First, states need to make sure the tracking system operates effectively and, second, limits costs to ratepayers.


We believe that the current structure of the WREGIS Committee and Stakeholder Committee, where state program administrators have designated positions, as do business sectors, are good models for the Hybrid Board and Stakeholder Advisory Group, which we support. As it is today, the Office would recommend that the chair of the Hybrid Board be a state that has designated WREGIS as its renewable energy tracking system.

Concluding remarks

The Office greatly appreciates WREGIS staff for responding to the announcement that CleanCounts would not renew its contract with WREGIS and the Office appreciates staff for quickly putting together multiple forums for public comment and providing the WREGIS Committee an opportunity to review the minimal viable product specifications and RFP responses.

The organizational and software changes at WREGIS come at a time of profound change across the Western Interconnection, including the development of competing day-ahead markets, state climate and clean energy policies, and new demands for clean power from regulated utilities and corporate buyers. It will be important for WREGIS to maintain the central role of states programs through these changing developments in its governance framework and provide a software that first meets the needs of stakeholders and will further enable states and corporations to advance their climate and clean energy goals.

Sincerely,

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Glenn Blackmon, Energy Policy Director

8/28/2025 | 8:49 AM PDT

Date