

Pacific Gas and Electric Company (“PG&E”) appreciates the opportunity to provide comments on WECC’s proposal to separate the Western Renewable Energy Generation Information System (“WREGIS”) from WECC. Since 2006, before WREGIS was formally launched, the organization has been a part of WECC, and PG&E views the Board’s decision as premature and recommends reconsideration of the key conclusion that WREGIS should be restructured as an independent entity. From PG&E’s perspective, separation imposes costs and risks on customers and regulators that currently rely on WREGIS to meet state mandated and/or voluntary renewables procurement targets. As WECC contemplates a new structure for WREGIS, PG&E recommends consultation with the California Energy Commission (“CEC”) and other regulatory bodies that provided advisory and financial support that was integral to WREGIS’ launch to weigh the merits and potential alternatives of an independent WREGIS. PG&E also recommends that WECC provide additional financial information detailing the anticipated costs to separate WREGIS and its associated impacts on stakeholders. Lastly, once these additional financial details are provided to stakeholders, WECC should solicit feedback on the separation plan itself, not just the structure of the separate entity, as is requested as part of these comments, prior to determining WREGIS’ structure going forward.

A well-functioning WREGIS is necessary under California’s current Renewables Portfolio Standard (“RPS”) compliance framework. WREGIS was designed to fulfill the CEC’s statutory obligation to track and verify renewable energy generation. As WECC’s July 15, 2025 “Future WREGIS Structure” document indicates, in recent years, WREGIS has suffered outages, gaps in functionality, and delays. From PG&E’s perspective, the WECC organization and its accountable leadership team have been central to navigating these and other WREGIS system issues. While PG&E recognizes WECC’s view that its role in overseeing WREGIS through recent challenges has placed a burden on WECC, PG&E cannot conclude that a fully independent WREGIS entity is the best solution for stakeholders.

Notably, an independent WREGIS entity will impose new risks that are likely to increase the costs of using WREGIS as a compliance and tracking tool. First, PG&E understands that under the WECC plan, existing WREGIS reserves will both be used to fund a new software program to fully replace the current M-RETS system, as well as to fund expenses for establishing a new company. As WECC’s FAQs indicate, it is expected that user fees may change as a result of these two activities.

PG&E anticipates the costs of establishing and operating an independent organization will necessarily result in increased user fees. At a minimum, separation introduces the loss of operational and administrative efficiencies that have resulted in the accumulation of WREGIS’ reserve funds. PG&E recommends that WECC communicate to stakeholders the estimated costs associated with separation that will be funded by reserves, as well as the anticipated budget for the first fiscal year associated with the corporate structure recommended by the WECC Board for further feedback. This information is critical for stakeholders concerned that the proposed structure could result in increased costs for customers.

Next, PG&E is concerned that separation poses risks to stakeholders presently reliant on WREGIS to fulfill current regulatory and voluntary renewables energy commitments. WREGIS’ operational challenges can lead to the delay of issuance of compliance instruments, resulting in

compliance risks under current backward-looking regulatory frameworks. PG&E is concerned that the establishment of an independent entity and its attendant governing structure can be time consuming and resource intensive. The future WREGIS structure contemplated by WECC does not provide any confidence that a newly independent organization and governance structure will be well positioned to successfully launch a new organization while simultaneously navigating those operational challenges recently experienced by WREGIS.

In summary, PG&E recommends further study on the costs and benefits of separation, as well as consideration of alternatives to an independent WREGIS entity. PG&E looks forward to coordinating with WECC, the CEC, and other stakeholders this Fall through stakeholder processes to determine the best outcome.