August 29, 2025

Ms. Andrea Coon

Western Renewable Energy Generation Information System (WREGIS)

Western Electricity Coordinating Council (WECC)

155 N 400 W, Suite 200

Salt Lake City, UT 84103-1111

RE: Feedback from Center for Resource Solutions on corporate structure and governance to establish WREGIS as a stand-alone company

Dear Ms. Coon,

Center for Resource Solutions (CRS) appreciates this opportunity to provide feedback on the recommended corporate structure and governance for WREGIS as a stand-alone entity, along with our priorities for a new software solution, minimum viable product (MVP), and future WREGIS functionality. We are grateful to be able to provide CRS's unique perspective on these matters as the administrator of the Green-e® program, as the administrator of the Clean Energy Tracking Collaborative (CETC), and as a nonprofit whose mission is to create policy and market solutions to advance sustainable energy.

CRS's Foundational Role in WREGIS and Leadership in Renewable Energy Tracking

CRS is a 501(c)(3) nonprofit organization with over 25 years of experience advancing robust, market-based solutions to support clean energy deployment and credible renewable energy tracking across the U.S. and internationally. We provide independent technical expertise, analytical tools, and programmatic solutions that enable reliable and transparent approaches to renewable energy tracking, accounting, procurement, and deployment goals.

CRS works with state agencies, system operators, utilities, energy producers, market participants, tracking systems, and other functional support entities to address the challenges of aligning diverse and evolving state policy, electricity market, and voluntary market goals. We specialize in the design and evaluation of renewable energy tracking systems, renewable energy programs, and GHG accounting frameworks, as well as the interaction of environmental attribute tracking systems with

energy markets, and the treatment of renewable energy certificates (RECs) in regulatory and voluntary programs.

On behalf of the California Energy Commission and the Western Governors Association, CRS was the lead contractor for the design of WREGIS in the early 2000s. CRS was the technical lead for the Operating Rules Committee, a multi-stakeholder committee including generators, utilities, control system operators, and state regulators from throughout the WECC that drafted the technical requirements and operating rules for WREGIS.

CRS is currently part of the WREGIS Stakeholder Advisory Committee (SAC) and regularly interacts with the system as a voluntary program administrator for the Green-e® Energy program—the leading independent certification for renewable electricity in North America. Green-e® Energy supports voluntary action and market integrity through rigorous standards and third-party verification. That program certifies over 143 million megawatt-hours (MWh) of renewable energy sales annually, serving about one million purchasers, including 78,000 businesses. In the West, this includes more than 36 million MWh of certified retail sales to over 650,000 customers—among them 18,000 businesses—with nearly 13 million MWh of WECC generation supplying these sales each year.

Finally, CRS has recently launched the new Clean Energy Tracking Collaborative (CETC), which will develop guidance and produce implementable specifications in collaboration with regional tracking systems to enhance tracking system data and capabilities to serve both state and voluntary clean energy objectives. The engagement of regional tracking systems, including WREGIS, will be essential to CETC's success. Active participation from WREGIS will help ensure that emerging standards and specifications are aligned with system functionality and stakeholder needs in the West, and that CETC's outcomes are both practical and widely adopted.

Comments on WREGIS Corporate and Governance Structure
WECC's recommendation to establish WREGIS as a nonprofit corporation under section 501(c)(4) of the Internal Revenue Code would align its structure with CleanCounts, the only other regional tracking system in the U.S. operating as a stand-alone nonprofit. While this structure would give WREGIS greater latitude to engage with government officials, we urge it to uphold its long-standing commitment to policy neutrality so that it can continue to serve all states, programs, and account holders equitably, despite their differing objectives and interests.

CRS supports WECC's recommendation that a stand-alone WREGIS be governed by a hybrid board of directors including both independent and stakeholder members, advised by a stakeholder advisory group (SAG). Given WREGIS's central role in serving state programs in the West, we recommend that at least half of the board seats be held by state regulators. In transitioning from the current elected WREGIS Committee, with its rules on seat representation, WREGIS should seek to maintain a

comparable level of transparency and balanced representation in its new organizational and governance structure.

The current SAC has been effective in providing account holders with transparency into WREGIS's decision-making and in ensuring that stakeholder perspectives and formal feedback are incorporated by the WREGIS Committee and staff. It will be important for the new governance structure to include a comparable SAG that is open to all account holders and governed by similar rules regarding leadership elections, turnover, and term limits. In addition, consideration should be given to maintaining a separate group or subgroup for program administrators, whose needs differ from those of other account holders. Finally, structural features that promote direct interaction between advisory bodies and the governing board should be preserved, such as the current practice of including the SAC Chair in the WREGIS Committee, to ensure the SAG retains a meaningful role in the new board structure.

Comments on Features and Functionality Objectives for WREGIS

In designing and implementing a new custom software solution for WREGIS, it will be essential to ensure opportunities for direct interaction between users and the third-party software provider, both during development and after implementation. Ongoing dialogue will help ensure that the system reflects user needs, addresses challenges as they arise, and remains flexible to accommodate future enhancements.

A number of core features and requirements should be preserved in a new WREGIS platform, consistent with the general requirements found in Section V.B. of the *Green-e® Framework for Renewable Energy Certification (Version 1.0, July 7, 2017)*,[1] including safeguards to prevent double issuance of certificates; publication of statistics and public lists of registered generators and account holders; functionality to indicate retirements for Green-e® certified sales; issuance of certificates based on system operator data; open and non-discriminatory access; and independent verification of generator attributes at registration. These requirements also ensure that all attributes of a megawatt-hour remain with the certificate and that key generator and generation information is recorded and available to participants and auditors.

Additionally, existing retirement and transfer reports should continue to provide the full breadth of tracked information and maintain current functionality. The ability to support multiple retirement accounts is also critical, enabling organizations to distinguish between retirements across different programs, products, and years—for example, for state Renewable Portfolio Standard compliance versus voluntary sales. This functionality is especially important for Green-e® verification processes. Program administrators must also continue to be able to confirm sets of serial numbers during verification.

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[1] Available at: https://www.green-e.org/programs/energy/documents.

Collectively, these features have proven to be foundational to WREGIS's credibility and should remain intact in the new system.

While many elements of WREGIS are working well, several improvements should be prioritized for inclusion in the MVP. A high priority is improving retirement procedures. CRS specifically requests implementation of a dedicated Green-e® retirement reason, with a reporting year drop-down and an additional details field. This need was previously identified in a program administrator work group session in September 2020 and a subsequent questionnaire in December 2020. At that time, stakeholders noted that retirement options were vague, prone to errors, and overly reliant on open-text fields. Redesigning the retirement page with program-dependent dropdown lists, reduced reliance on open-text fields, and improved specificity would benefit both Green-e® and state programs. Although it is unclear whether this exploration led to substantive changes during or after the transition to MRETS software, such an enhancement remains a priority for a new customized WREGIS system.

CRS also emphasizes the importance of restoring and improving the "WREGIS Public Report Active Generators." This report, previously available as a web-based resource, is currently available in an Excel file format, which we find to be less accessible and user-friendly than the previous iteration. Restoring this functionality in a web-based format would improve usability and transparency. CRS also generally supports the development of APIs to allow greater connectivity with external databases, enabling integration and data-sharing opportunities as needs evolve.

The new WREGIS platform should also be built with a forward-looking design that facilitates expansion and anticipates future functionality changes. While we do not expect these functionality changes to be implemented immediately or included in the MVP, it is critical that the new platform be designed with them in mind—creating a foundation that can support future enhancements without requiring significant rework or dismantling of core structures. These areas for future development include hourly tracking, storage tracking, clean fuels tracking, tracking of market allocation data, and eventually all-generation tracking.

There is increasing demand from both states and voluntary buyers for more granular generation data, particularly hourly data, to better match clean energy procurement with grid operations. To meet this need, WREGIS should plan for the capability to include hourly generation data on certificates and, eventually, to mint hourly, fully transferrable certificates. Building in the capacity for hourly tracking in the future would align WREGIS with emerging state policy requirements and voluntary market trends, providing account holders with greater precision and flexibility in demonstrating the timing of renewable energy use.

All-generation tracking in particular merits serious consideration. While WREGIS currently tracks only renewable generation, other systems—such as the New England Power Pool Generation Information

System (NEPOOL-GIS), the PJM Generation Attribute Tracking System (PJM-GATS), and the New York Generation Attribute Tracking System (NYGATS)—have successfully implemented all-generation certificate tracking. This approach enables precise accounting of delivered power, residual mixes, and emissions, supporting a range of state and market needs including renewable portfolio standards, power source disclosure policies, cap-and-trade programs, and carbon-free standards. Expanding WREGIS to track all generation could reduce costs for states, market operators, and utilities, while enhancing the accuracy and credibility of accounting across the Western Interconnect.

In addition, as we have emphasized recently with the SAC, CRS recommends addressing emerging challenges around market allocation data from new greenhouse gas emissions allocation frameworks from the California Independent System Operator (CAISO) and the Southwest Power Pool (SPP). These frameworks will allocate generation and associated emissions to retail load for reporting purposes, affecting the same generation tracked in WREGIS and creating risks of double counting. To safeguard the integrity of renewable energy claims, CRS recommends that WREGIS incorporate monthly allocation data directly onto certificates from affected generators. Making this information transparent to account holders and program administrators would enable informed decision-making, protect renewable claims, and ensure consistency with state and voluntary program requirements.[2]

We would be happy to provide additional information about any or all of the future improvements and functionality expansions described above.

CRS commends WREGIS staff for their dedication and perseverance in addressing recent software challenges while balancing the diverse needs of stakeholders and programs, and for their steady leadership in navigating a complex set of internal transitions and external developments. Please let me know if we can provide any further information or answer any other questions.

Sincerely,

_____/s/_____

Todd Jones
Head of Policy

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[2] For more information, see Center for Resource Solutions. (2024, November 7). *Letter to the Western Renewable Energy Generation Information System (WREGIS) Stakeholder Advisory Committee regarding GHG accounting frameworks and coordination with WREGIS*. San Francisco, CA.