



CALIFORNIA ENERGY COMMISSION



August 29, 2025

Melanie Frye
WECC President and CEO
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, Utah 84103

Subject: California Energy Commission Staff Comments on Proposed Establishment of WREGIS as a Stand-Alone Entity

President Frye:

The California Energy Commission (Energy Commission) staff appreciates the opportunity to comment on the proposed separation of the Western Renewable Energy Generation Information System (WREGIS) from the Western Electricity Coordinating Council (WECC), as well as its proposal to run a Request for Proposals (RFP) process for the development of a new custom Renewable Energy Certificate (REC) tracking platform.

The Energy Commission is leading California to a 100 percent clean energy future for all. As the state's primary energy policy and planning agency, the Energy Commission is committed to reducing energy costs and environmental impacts of energy use while ensuring a safe, resilient, and reliable supply of energy.

The Energy Commission recognizes WECC's urgency in preparing for forthcoming changes to WREGIS and we commend WECC for initiating new processes to share information and receive feedback. However, we believe stakeholders should have additional time and opportunity to provide feedback beyond the current August 29 comment deadline before any substantive decisions are made.

The Energy Commission has significant interest in ensuring a successful outcome to the WREGIS transition underway. An operational and robust REC tracking system is critical to maintaining the success and credibility of clean energy programs like Renewables Portfolio Standard (RPS) programs across the West upon which significant capital investment has been and will be made. The Energy Commission has a statutory mandate to develop and ensure a functioning REC tracking system for California's RPS program. While California is not obligated by statute to use WREGIS as the REC

tracking system for its RPS program, it has invested millions of dollars and significant staff resources into the development, launch, and ongoing operation of the tracking system. The success of this transition is consequential to all of California and the West.

As a preliminary matter, the Energy Commission requires more time to provide adequate input on the governance structure and RFP process before WECC makes any substantive decisions. The August 29 deadline is insufficient for stakeholders to organize resources to provide the level of feedback warranted for a matter as consequential and far-reaching as the future of the REC tracking system for the Western Interconnection and the fourth largest economy in the world. As has been identified in various venues regarding the transition, once funds have been allocated toward a specific pathway, it is extremely challenging to change course.

With the understanding that more time for substantive feedback must be provided, the following is a list of priorities that will guide the Energy Commission's continued participation related to WECC's proposed transition.

As the largest user of WREGIS, both in terms of regulatory RECs retired, as well as obligated reporting entities, the Energy Commission seeks a successful outcome to the WREGIS transition and looks forward to ongoing open dialogue and engagement with WECC, WREGIS, and other stakeholders in the Western Interconnection.

The Energy Commission has the following priorities regarding the WREGIS transition.

Ensure that the approach taken best serves California's state policy objectives

As a threshold matter, it is unclear at this time whether the separation of WREGIS from WECC and the development of a new custom REC system are actions that would benefit users of WREGIS and support California meeting its reliability and clean energy mandates at least cost.

The Energy Commission encourages WECC to consider all options for how WREGIS can be best positioned to meet the needs of users across the Western Interconnection. The Energy Commission is seriously concerned about the loss of institutional knowledge, experience, and data integrity that is possible during a transition of this sort.

Ensure that the governance structure reflects California's priorities in ongoing organizational decision-making

In light of California's significant share of WREGIS activities and the Energy Commission's vital role in RPS program administration, the governance structure should maintain an active and defined role for the Energy Commission in decision-making and oversight.

Ensure Californians receive the best value for the highest level of service

It is the Energy Commission's understanding that a new custom software product and development of a stand-alone entity are projected to result in increased user fees, which could result in increased costs to Californians. The Energy Commission would like to better understand the costs and possible impacts of the proposed and alternative options.

Ensure transparency and that the perspectives and expertise of all stakeholders are reflected in decision-making

WECC and WREGIS should continue communicating with stakeholders on a regular basis throughout this process, including frequent and consistent updates to ensure all stakeholders are aware of potential impacts and can prepare as needed.

WREGIS users and regulatory bodies have deep and varied expertise that spans energy programs and policies to software and database development. The process should center and value the perspectives of these users and create consistent opportunities for users to provide input and engage meaningfully in the decision-making process throughout the planning and into the implementation phase.

Ensure foresight and redundancy for continued seamless functioning and performance of the existing REC tracking system

It is unclear whether WECC and WREGIS have contemplated and planned for the potential that the software development process and WREGIS transition may take longer than planned in the documentation shared to date. The Energy Commission recommends thorough articulation and commitment to the maintenance of the current level of WREGIS functionality throughout the transition.

Thank you for considering these comments and for the ongoing collaboration.

Sincerely,

/s/ Sean A. Simon

--

Sean Simon

Director (Acting)

Siting, Transmission and Environmental Protection Division