

DOCKETED	
Docket Number:	21-RPS-02
Project Title:	Renewables Portfolio Standard 10th Edition Guidebook Update
TN #:	263868
Document Title:	Josh Harmon Comments - PG&E Comments RE Scope of RPS Guidebook 10th Edition
Description:	N/A
Filer:	System
Organization:	Josh Harmon
Submitter Role:	Applicant
Submission Date:	6/4/2025 3:30:59 PM
Docketed Date:	6/4/2025

Comment Received From: Josh Harmon
Submitted On: 6/4/2025
Docket Number: 21-RPS-02

PG&E Comments RE Scope of RPS Guidebook 10th Edition

Additional submitted attachment is included below.



Josh Harmon
CEC Liaison
State Agency Relations

1415 L Street, Suite 280
Sacramento, CA 95814
(628) 777-4138
Joshua.Harmon2@pge.com

4 June 2025

California Energy Commission
Docket Number 21-RPS-02
715 P Street
Sacramento, CA 95814

RE: California Energy Commission Scoping Meeting on Proposed Updates for the Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Workshop on the Renewables Portfolio Standard (RPS) Eligibility Guidebook, Tenth Edition, held on May 21, 2025, and appreciates CEC staff for preparing and presenting a thorough and informative workshop presentation. PG&E looks forward to working with the CEC and stakeholders on developing the tenth edition of the RPS Eligibility Guidebook.

PG&E's only comment on the scope of the proceeding concerns developing guidelines and backup plans should the Western Renewable Energy Generation Information System (WREGIS) experience reliability and functionality issues adversely impacting the quality and timely creation and administration of WREGIS certificates.

PG&E encourages the CEC to begin stakeholder discussions to develop backup plans for renewable energy credit (REC) reporting in the event WREGIS is not operating reliably.

WREGIS is foundational to California's existing RPS program. It serves as both the system of record, (for creating, transferring, and tracking RECs), and the means to carry out commercial REC transactions in California and throughout the Western grid. Thus, it is essential for its software to function accurately and reliably.

As the CEC knows, following a 2022 switch to a new WREGIS software system developed and administered by M-RETS, WREGIS began encountering several functionality issues including a critical error in the summer of 2023 affecting the issuance of RECs for large solar facilities and facilities that use multiple fuel types. This error resulted in a substantial volume of incorrectly issued RECs. In addition, WREGIS experienced other functionality shortcomings, compromising key features such as e-tag matching and REC transfers. While these issues were eventually resolved, many load serving entities were impacted, resulting in delayed REC reporting to the CEC.

While WREGIS is operating adequately today, on May 1, 2025, WREGIS notified its users that its operating agreement with M-RETS will end on December 31, 2027, and M-RETS has opted to not extend the agreement beyond this date. WREGIS is now exploring options to replace the M-RETS WREGIS

software with another system that meets the needs of market participants as well as the states and provincial programs that WREGIS serves. Designing and implementing a new system to meet the ever-expanding needs of the western-wide renewable energy market is no small task. This looming change to a new WREGIS software and accompanying support services further underscores the need for the CEC to develop guidelines and backup plans should WREGIS functionality issues arise during this upcoming transition and PG&E encourages the CEC to begin stakeholder discussions to do so.

PG&E appreciates the opportunity to comment on this workshop and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
State Agency Relations