

DOCKETED

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RPS-2021-01 first retirement date rule

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From what authority does the use of "first retirement date" come?

Steve Uhler
sau@wwmpd.com

Additional submitted attachment is included below.

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From what authority does the use of "first retirement date" come?

Renewables Portfolio Standard Verification and Compliance Methodology Report, Third Edition, TN247672 claims "CEC staff uses the first retirement date to determine compliance with the 36-month requirement.". See attached TN247672_20221123T113957_Renewables Portfolio Standard Verification and Compliance Methodology Repor.pdf.

Is the rule moot because WREGIS Operating Rules say "Retirement Account: A repository for WREGIS Certificates that the Customer or WREGIS Administrator wants to designate as Retired and remove from circulation (e.g., to demonstrate compliance with a state's RPS). Once a Certificate has been transferred into a WREGIS Retirement Account, it cannot be transferred again.". See attached WREGIS Operating Rules October 2022 Final.pdf

Steve Uhler
sau@wmpd.com