

**DOCKETED**

<b>Docket Number:</b>	21-RPS-01
<b>Project Title:</b>	Renewables Portfolio Standard Compliance Period 3 (2017 - 2020) Verification and Compliance
<b>TN #:</b>	253044
<b>Document Title:</b>	Steve Uhler Comments - RPS-2021-01 Tracking environmental attribute ownership for RECs
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Steve Uhler
<b>Submitter Role:</b>	Other Interested Person
<b>Submission Date:</b>	11/7/2023 10:48:28 PM
<b>Docketed Date:</b>	11/8/2023

*Comment Received From: Steve Uhler*  
*Submitted On: 11/7/2023*  
*Docket Number: 21-RPS-01*

## **RPS-2021-01 Tracking environmental attribute ownership for RECs**

RPS-2021-01 Tracking environmental attribute ownership for RECs

How did the Energy Commission confirm environmental attribute ownership for RECs when verifying Third RPS period (2017-2020) LSE claims, to ensure environmental attribute ownership for RECs was not applied to the RPS of another state or to a voluntary claim?

Steve Uhler  
sau@wwmpd.com

*Additional submitted attachment is included below.*

RPS-2021-01 Tracking environmental attribute ownership for RECs

How did the Energy Commission confirm environmental attribute ownership for RECs when verifying Third RPS period (2017-2020) LSE claims, to ensure environmental attribute ownership for RECs was not applied to the RPS of another state or to a voluntary claim?

The attached guidelines do not determine environmental attribute ownership for RECs.

WREGIS Terms of Use clearly states "WREGIS is not intended to establish legal title to Certificates, but instead to accurately track who is registered as possessing Certificates. Customers must address any issues regarding ownership or security interests in the Certificates outside of WREGIS."

PUC subsection 399.25(c) requires the Energy Commission to establish a system for tracking and verifying renewable energy credits that, through the use of independently audited data, verifies the generation of electricity associated with each renewable energy credit and protects against multiple counting of the same renewable energy credit. The Energy Commission shall consult with other western states and with the WECC in the development of this system.

What guidelines were adopted pursuant to PRC 25747 to establish the PUC subsection 399.25(c) tracking system? Do these guidelines require tracking environmental attribute ownership for RECs?

How does the Energy Commission ensure when verifying renewable energy credits that the environmental attribute ownership for the RECs have not been transferred or sold to anyone else?

Steve Uhler  
sau@wwmpd.com