

DOCKETED

Docket Number:	11-RPS-01
Project Title:	Renewables Portfolio Standard
TN #:	211407
Document Title:	DTE Stockton LLC Audit Report
Description:	Audit report submitted by DTE Stockton LLC for the creation of REC's in WREGIS.
Filer:	Judi Carter
Organization:	DTE Stockton, LLC
Submitter Role:	Other Interested Person
Submission Date:	5/9/2016 9:34:45 AM
Docketed Date:	5/9/2016

DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800 Fax (734) 302-4802

January 15, 2016

Rob Oglesby
Executive Director
California Energy Commission
Office of the Executive Director
1516 9th Street, MS-39
Sacramento, CA 95814-5512

Dear Executive Director:

This letter is in reference to the generation facility owned by DTE Stockton, LLC ("DTE Stockton"), located at 2526 West Washington Street, Stockton, CA (a.k.a Stockton Biomass). This generating facility commenced commercial operation on February 21, 2014 and was granted RPS-ID number **60964A** by the California Energy Commission on March 7, 2014. The generating facility has also been designated WREGIS Generating Unit identification number **W3540** as of July 9, 2014.

DTE Stockton is requesting the creation of retroactive renewable energy credits ("Retroactive RECs") per the California Energy Commission Guidebook Eight Edition. The following table summarizes the vintage months and years for which Retroactive RECs are being requested:

<u>GU ID</u>	<u>PG&E ID #</u>	<u>Project Name</u>	<u>Vintage</u>	<u># of RECs</u>
W3540	33R099	DTE Stockton	11/2013	3,677
W3540	33R099	DTE Stockton	12/2013	9,144
W3540	33R099	DTE Stockton	01/2014	9,667
W3540	33R099	DTE Stockton	02/2014	21,086
W3540	33R099	DTE Stockton	03/2014	24,647

DTE Stockton is submitting the attached report and supporting documentation in compliance with the California Energy Commission Guidebook Eight Edition for the creation of Retroactive RECs in California. DTE Stockton submitted its initial request to retroactively create renewable energy credits dated October 6, 2015.

The report has been prepared by Plante & Moran, PLLC an nationally recognized independent accounting firm in accordance with standards established by the American Institute of Certified Public Accountants (AICPA). In addition to the AICPA standards, the procedures performed were consistent with the California Energy Commission Guidebook Eight Edition and concludes the

RECs for the vintage years listed above have not been sold, traded, or otherwise transferred to any individual or entity to satisfy any state regulatory or volunteer program.

If you have any questions, I can be reached at (734) 302-4845 or John Reis, Director of Assets, DTE Stockton (734) 302-4836.

Sincerely,



Mark Rigby
Vice President
DTE Stockton, LLC

Enclosure



Audit Support Attachments

1. **DTE Stockton Request for Retroactive RECS – Dated Oct 6th 2015**

2. **Stockton Audit Report**

3. **REC Confirmation Letters**

- A. Confirmations to State Agencies – (See Report Table 1c Note II and III)
- B. Tracking System Confirmations (See Report Table 1c Note IV and V)
 - a. WREGIS
 - b. MRETS
 - c. NCRETS
 - d. NAR
 - e. NEPOOL
- C. Confirmations to Voluntary Agencies – (See Report Table 4)

4. **Accounting Documentation**

- A. Cash Receipt Reconciliation to Invoice Support
- B. Electric Revenue Reconciliation to Invoice Support
- C. Misc Revenue Reconciliation to Cash Receipts

DTE Stockton, LLC

CONTRACT # 421.00509

October 6, 2015

Rob Oglesby
Executive Director
California Energy Commission
Office of the Executive Director
1516 9th Street, MS-39
Sacramento, CA 95814-5512

Dear Executive Director:

This letter is in reference to the generation facility owned by DTE Stockton, LLC ("DTE Stockton"), located at 2526 West Washington Street, Stockton, CA (a.k.a Stockton Biomass). This generating facility commenced commercial operation on February 21, 2014 and was granted RPS-ID number 60964A by the California Energy Commission on March 7, 2014. The generating facility has also been designated WREGIS Generating Unit identification number W3540 as of July 9, 2014.

DTE Stockton is requesting the creation of retroactive renewable energy credits ("Retroactive RECs") per the recently adopted CEC Resolution No:14-1007-10. The following table summarizes the vintage months and years for which Retroactive RECs are being requested:

<u>GU ID</u>	<u>PG&E ID #</u>	<u>Project Name</u>	<u>Vintage</u>	<u># of RECs</u>
W3540	33R099	DTE Stockton	11/2013	3,677
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W3540	33R099	DTE Stockton	02/2014	21,086
W3540	33R099	DTE Stockton	03/2014	24,647

DTE Stockton is requesting these Retroactive RECs for a number of reasons. First, WREGIS policy limits the creation of Retroactive RECs to a 75-day period. This policy only allows for the creation of Retroactive RECs beyond the 75-day period with a written formal request from a state's governing body, in this case the California Energy Commission.

DTE Stockton was delayed in establishing the generating facility within its WREGIS account due to one of the required registration items not being available for submission – the most recent Department of Energy EIA Form 860. The EIA Form 860 is a form submitted annually to the Energy Information Administration ("EIA") of the Department of Energy which details certain

specifics of operating power plants such as location, fuel sources, and equipment utilized to produce energy and electricity at the site. Since the generating facility was converted from a coal-fueled facility to a woody biomass-fueled facility, there was a large number of equipment changes from the original plant arrangement which needed to be updated in the Form 860. Coincidentally, the EIA undertook a project to redesign the Form 860 at the very time DTE Stockton was attempting to be created as a WREGIS generating unit. This EIA effort began during fourth quarter 2013 and lasted through June 2014, thus making the form unavailable for editing and submission. Once the form became available, DTE Stockton diligently completed and submitted the new form for EIA acceptance. DTE Stockton was finally able to submit the updated Form 860 to WREGIS in early July 2014 and WREGIS quickly established the Generating Unit W3540. Unfortunately, by this time WREGIS was unable to create and transfer all of the retroactive RECs which had been generated at this facility.

Attached for ease of reference, please find the following documents which were submitted by DTE Stockton, as referenced above:

- Excerpt from *Federal Register Vol. 78, No.44 Wednesday March 6, 2013*
 - Documenting scope of edits being made to the EIA-860 Form
- Excerpt from *Supporting Statement for Survey Clearance: Electric Power & Renewable Electricity Surveys*. US Energy Information Administration, December 5, 2013
 - Detailed justification and scope of edits being made to EIA-860 Form
 - Table illustrating the normal portal opening (January) to submit EIA-860 data
- Email transmittal – June 8, 2013 *Subject: WREGIS Account Approved*
 - Confirmation of account creation
- Email transmittal – June 14, 2013 *Subject: Re: WREGIS Account Registration*
 - Directions from WREGIS to register a generator (including statement that an EIA-860 form would not be required)
- Email transmittals (8) – February 28, 2014 through March 25, 2014 *Subject: Stockton Biomass (W3540) Generation Registration*
 - Documentation of generator registration activities including request for submittal of a new EIA-860 form
- Screen shot of Annual Electric Generator Report (Form EIA-860), Submitted July 2, 2014
 - Evidence that EIA-860 was filed
- Email transmittals (2) – July 11, 2014 *Subject: Enable PG&E for DTE Stockton REC Upload*
 - Documentation of activity to get generation uploaded into WREGIS system upon generator approval

Per CEC Resolution No.: 14-1007-10 DTE Stockton makes the following attestations:

1. The renewable energy credits, as defined in Public Utility Code section 399.12 and the *Renewable Portfolio Standard Eligibility Guidebook*, associated with the generation for the vintage months and years specified above have not been sold, traded, or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program
2. DTE Stockton will submit an audit report as specified in the *Renewable Portfolio Standard Eligibility Guidebook, Eight Edition* within 90 days after the request is approved
3. DTE Stockton will pay for all costs and expenses incurred by WREGIS staff to create the retroactive RECs, if the request is approved

4. The information contained in this request and any supporting documentation is true, correct, and complete to the best of the knowledge of the undersigned officer of DTE Stockton

Sincerely,

Mark Rigby

Mark Rigby
Vice President
DTE Stockton, LLC

REVIEWED
BY: *KCM*
LEGAL

REVIEWED BY:
ACCOUNTING

JB

Audit Support Attachments

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2. **Stockton Audit Report**
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**Independent Accountant's Report on
Applying Agreed-upon Procedures**

Mr. Mark Rigby
DTE Stockton, LLC
414 South Main Street, Suite 600
Ann Arbor, MI 48104

We have performed the procedures described in Schedule I, which were agreed to by DTE Stockton, LLC ("Stockton" or the "Company"), solely to assist with respect to retroactively reinstating renewable energy credits ("RECs") generated as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generation subsequent to commercial operations up to March 31, 2014. The Company's management is responsible for the Company's accounting records and documentation of the generation of renewable energy credits. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described in Schedule I, either for the purpose for which this report has been requested or for any other purpose.

Our procedures and findings are described in Schedule I. Based on the procedures set forth in this schedule to verify activity surrounding the RECs, no evidence was noted of any RECs generated by the Company being sold, traded, or otherwise transferred to any other individual or entity to satisfy any state regulated or voluntary program.

We were not engaged to, and did not, conduct an audit, the objective of which would be the expression of an opinion, on the accounting records. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of DTE Stockton, LLC, Western Renewable Energy Generation Information System (WREGIS), and the California Energy Commission (the "CEC") and is not intended to be and should not be used by anyone other than those specified parties.

Plante & Moran, PLLC

January 14, 2016

DTE Stockton, LLC

Agreed-upon Procedures Schedule I

The procedures performed are in accordance with the discussions between DTE Stockton and the CEC, in order to verify that the renewable energy credits, as defined in Public Utilities Code section 399.12 and the Renewables Portfolio Standard Eligibility Guidebook associated with the generation for the vintage month(s) and year(s) specified in Item 6.d.were not sold, traded, or otherwise transferred to any other individual or entity used to satisfy any state regulatory or voluntary program. The following procedures were performed to determine whether the renewable credits in question would have been eligible to satisfy any state regulatory or voluntary program:

- I. Related to section III.A.1.a.3.2.a of the CEC Renewable Portfolio Standard Eligibility Guidebook, 8th Edition ("Guidebook"), the following agreed upon procedures were performed:
 - a. DTE Stockton researched and determined the number of state regulatory programs and voluntary programs that would be eligible to satisfy its program requirements by obtaining renewable energy from DTE Stockton or otherwise participate in renewable energy portfolio standards. Steps taken by DTE Stockton included:
 - i. Broad survey of all state and US territory renewable portfolio standards laws and regulations. To facilitate this search the Company relied on the ***Database of State Incentives for Renewables & Efficiency (DSIRE)*** at www.dsireusa.org/incentives/allsummaries.cfm.
 - ii. After reviewing the DSIRE information, all states and territories were sorted into one of three categories by the Company: No RPS; RPS – not applicable; RPS – applicable.
 - iii. RPS – not applicable include states and territories where details limit the ability or permissibility of selling renewable energy credits into the specific state. Such limits may include: geographic requirements of the project; electricity deliverability requirements; ban on trading out of state renewable energy credits; and limited to efficiency projects.
 - iv. States classified as No RPS and RPS – not applicable were not contacted.
 - v. A state administrator or contact person for each of the identified potential market states was identified and contacted by DTE Stockton to better understand their programs and if renewable energy credits generated at DTE Stockton would be eligible for sale or transfer to satisfy the regulatory requirements within the specific state.

The Company discussed the procedures and provided supporting documents for the above steps with us. We performed the following:

DTE Stockton, LLC

We obtained the DSIRE information from the Company and sorted all states and territories in three categories: No RPS; RPS – not applicable; RPS – applicable.

Results: See Tables 1a (no RPS), 1b (RPS not applicable), and 1c (RPS applicable)

- b. DTE Stockton further determined if conditions exist in any of the state or voluntary programs that would limit the sale, trade, or transfer of the DTE Stockton renewable credits.
 - i. In certain situations DTE Stockton obtained publicly available renewable energy generation tracking system reports (MRETS, NAR, and NCRETS) of Active Generators and Active Account Holders, in order to see if DTE Stockton, LLC was listed as a generating facility within these states.
 - ii. DTE Stockton also obtained listing from a tracking system verifying RECs were not created by that entity for the vintage months in question.
 - iii. Plante Moran sent confirmation letters to the state agencies identified and DTE Stockton sent confirmation letters to the voluntary market companies identified.

Results: Plante Moran reviewed the confirmation letters sent and received from companies/agencies listed in Table 4 as well as the WREGIS confirmation. No exceptions noted.

- c. DTE Stockton determined the final list of state regulatory and voluntary renewable programs to confirm to independently satisfy the renewable energy credits were not sold, traded, or otherwise transferred to one or more of these programs. We obtained the list of the state regulatory and voluntary renewable programs to confirm.

Results: See Tables 1a, 1b, and 1c

- d. We mailed the confirmations (as determined by steps above) directly to the agencies, requested confirmation that the RECs were not used to satisfy the applicable program or that the RECs were retired without having been claimed to satisfy the requirements of said program.

Results: See Tables 1a, 1b, and 1c

- e. We followed up by sending a second confirmation in case the first confirmation was not received by us.

Results: See Tables 1a, 1b, and 1c

DTE Stockton, LLC

Summary of Results: Based on the procedures performed in step 1 to verify activity surrounding the RECs, no evidence was noted of any RECs generated by the Company being sold, traded, or otherwise transferred to any other individual or entity to satisfy any state regulated or voluntary program. See Tables 1a, 1b, 1c, and 4 for list of state regulatory and volunteer programs and results of procedures performed.

2. Related to section III.A.1.a.3.2.b of Guidebook, the following agreed upon procedures were performed:

- a. We obtained and reviewed the general ledger of the Company for the sales account for the period beginning November 1, 2013 and ending October 31, 2015. We obtained all invoices supporting the general ledger activity and reviewed the invoices for references to a sale of RECs.

Results: No references to the sale of RECs were noted in the review of the invoices recorded in the accounts listed in Table 3.

- b. We obtained and reviewed the general ledger of the Company for the miscellaneous income account for the period beginning November 1, 2013 and ending October 31, 2015. We obtained all invoices supporting the general ledger activity and reviewed the Invoices for references to a sale of RECs.

Results: No references to the sale of RECs were noted in the review of the invoices recorded in the accounts listed in Table 3.

- c. We obtained and reviewed the general ledger of the Company for the cash and cash equivalents account for the period beginning November 1, 2013 and ending October 31, 2015. For any debits (increases) to the account, we agreed the sales and miscellaneous income accounts (tested in items a. and b. above) in order to determine that additional cash proceeds were not received.

Results: All debits to the cash and cash equivalents accounts tested agreed to the amount recorded in the sales and miscellaneous income accounts without exception. See Table 3 for sales and miscellaneous income general ledger accounts reviewed.

Summary of Results: Based on the procedures performed in step 2 to verify activity surrounding the RECs, no evidence was noted of any RECs generated by the Company being sold, traded, or otherwise transferred to any other individual or entity to satisfy any state regulated or voluntary program. Refer to Table 3 for sales and miscellaneous income accounts reviewed.

3. Related to section III.A.1.a.3.2.c of Guidebook, if the agreed upon procedures set forth above determined the renewable energy credits in question were sold, traded, or otherwise transferred, DTE Stockton was to provide the name and address of these individual(s) or entity(s), the corresponding amount(s), vintages, and transaction dates of the transferred renewable energy credits. We prepared a report summarizing the information provided by DTE Stockton.

Results: No such individuals or entities were identified in the procedures performed. Accordingly, there is no information to report.

Table 1a

State	RPS Status per DSIRE		State Agency Contact	Initial Confirmation	Second	Confirmation	Notes
	Database	State Agency		Sent	Confirmation Sent	Received	
Alabama	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Alaska	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Arkansas	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Florida	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Georgia	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Idaho	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Kentucky	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Louisiana	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Mississippi	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Nebraska	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Tennessee	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Wyoming	No RPS	N/A, see I	N/A, see I	N/A	N/A	N/A	I

Notes:

I - Per review of DSIRE database, state does not have a Renewable Portfolio Standard (RPS) or RPS program is not applicable to DTE Stockton. No confirmations were sent to these states.

Table 1b

State	RPS Status per DSIRE		State Agency Contact	Initial Confirmation	Second	Confirmation	Notes
	Database	State Agency		Sent	Confirmation Sent	Received	
Connecticut	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Delaware	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Hawaii	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Indiana	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Iowa	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Maryland	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
New Hampshire	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
New Jersey	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
New York	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Oklahoma	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Pennsylvania	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
South Carolina	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Texas	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Vermont	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Virginia	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
West Virginia	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I
Wisconsin	RPS - Not applicable	N/A, see I	N/A, see I	N/A	N/A	N/A	I

Notes:

I - Per review of DSIRE database, state does not have a Renewable Portfolio Standard (RPS) or RPS program is not applicable to DTE Stockton. No confirmations were sent to these states.

Table 1c

RPS Status per DSIRE		State Agency	State Agency Contact	Initial Confirmation	Second	Confirmation	Notes
State	Database			Sent	Confirmation Sent	Received	
Colorado	RPS - Applicable	Colorado Public Utilities Commission	Bill Dalton	7/13/2015	N/A	7/15/2015	V
Illinois	RPS - Applicable	Illinois Power Agency	Anthony Star	7/13/2015	7/20/2015	7/27/2015	II
Kansas	RPS - Applicable	Kansas Corporation Commission	Jon Wilson	7/13/2015	7/20/2015	7/24/2015	II
Maine	RPS - Applicable	Maine Public Utilities Commission	Mitchell Tannenbaum	7/13/2015	7/20/2015	7/20/2015	II
Massachusetts	RPS - Applicable	Massachusetts Department of Energy Resources	Mike Judge	7/13/2015	7/20/2015	8/11/2015	II
Michigan	RPS - Applicable	Michigan Public Service Commission	Katie Trachsel	7/13/2015	7/20/2015	7/22/2015	II
Montana	RPS - Applicable	Montana Public Service Commission	Robert Decker	7/13/2015	7/20/2015	9/2/2015	II
Nevada	RPS - Applicable	Nevada Public Utilities Commission	Darci Dalessio	7/13/2015	7/20/2015	7/20/2015	II
Ohio	RPS - Applicable	Ohio Public Utilities Commission	Stuart Siegfried	7/13/2015	7/20/2015	7/27/2015	II
Oregon	RPS - Applicable	Oregon Department of Energy	Julie Peacock	7/13/2015	7/20/2015	11/16/2015	III
South Dakota	RPS - Applicable	South Dakota Public Utilities Commission	Brian Rounds	7/13/2015	7/20/2015	8/7/2015	II
Washington	RPS - Applicable	Washington State Department of Commerce	Glenn Blackmon	7/13/2015	7/20/2015	7/29/2015	V
Arizona	RPS - Applicable	Arizona Corporation Commission	Ray Williamson	7/13/2015	7/20/2015	See Note IV	IV
Minnesota	RPS - Applicable	Minnesota Public Utilities Commission	Michel Rebholz	7/21/2015	7/29/2015	See Note IV	IV
Missouri	RPS - Applicable	Missouri Public Service Commission	Dan Beck	7/13/2015	7/20/2015	See Note IV	IV
New Mexico	RPS - Applicable	New Mexico Public Regulation Commission	Heidi Pitts	7/13/2015	7/20/2015	See Note IV	IV
North Carolina	RPS - Applicable	North Carolina Utilities Commission	Dan Conrad	7/13/2015	7/20/2015	See Note IV	IV
North Dakota	RPS - Applicable	North Dakota Public Service Commission	Jerry Lein	7/13/2015	7/20/2015	See Note IV	IV
Rhode Island	RPS - Applicable	Office of Energy Resources	Cynthia Wilson-Frias	7/13/2015	7/20/2015	See Note IV	IV
Utah	RPS - Applicable	Utah Office of Energy Development	Denis Beaudoin Brens	7/13/2015	7/31/2015	See Note IV	IV

Notes:

II - Positive confirmation received by Plante Moran on the date listed, indicating that Renewable Energy Credits generated by DTE Stockton listed in Table 2 were not sold, traded, or otherwise transferred to any individual or entity or used to satisfy the renewable energy program(s) which the indicated state agency regulates and monitors for compliance.

III - Positive confirmation received by DTE Stockton on the date listed, indicating that Renewable Energy Credits generated by DTE Stockton listed in Table 2 were not sold, traded, or otherwise transferred to any individual or entity or used to satisfy the renewable energy program(s) which the indicated state agency regulates and monitors for compliance.

IV - No confirmation response received from state agency. Plante Moran obtained and reviewed either: 1) publicly available renewable energy generation tracking system reports (MRETS, NAR, and NCRETS) of Active Generators and Active Account Holders, noting that DTE Stockton, LLC was not listed as a generating facility within these states; or 2) received a confirmation from a tracking system (WREGIS) verifying RECs were not created by that entity for the vintage months in question.

V - Confirmation received but respondent indicated they cannot positively respond as worded - Plante Moran obtained and reviewed either: 1) publicly available renewable energy generation tracking system reports (MRETS, NAR, and NCRETS) of Active Generators and Active Account Holders, noting that DTE Stockton, LLC was not listed as a generating facility within these states; or 2) received a confirmation from a tracking system (WREGIS) verifying RECs were not created by that entity for the vintage months in question.

Table 2

DTE Stockton RECs generated from November 1, 2013 through March 31, 2014:

Test Power (November 1, 2013 through February 20th, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
41579	3,677	DTE Stockton	60964A	W3540
41609	9,144	DTE Stockton	60964A	W3540
41640	9,667	DTE Stockton	60964A	W3540
41671	13,470	DTE Stockton	60964A	W3540

Commercial Operation (February 21st through March 31st, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
41671	7,616	DTE Stockton	60964A	W3540
41699	24,647	DTE Stockton	60964A	W3540

Table 3

General Ledger	
<u>Account Number</u>	<u>Account Description</u>
402255	Lease Revenue
405000	Operating Revenue
406000	Miscellaneous Revenue

Table 4

Voluntary Market Company/Agency	Confirmation Received	Notes
Green-e Energy	3/2/2015	I
Sterling Planet		II
Renewable Choice Energy		II
3Degrees	10/28/2015	I
Nexant		III
Element Markets	11/11/2015	I

Notes:

I - Positive confirmation received by DTE Stockton on the date listed, indicating that Renewable Energy Credits generated by DTE Stockton listed in Table 2 were not sold, traded, or otherwise transferred to any individual or entity or used to satisfy the renewable energy program(s) in which the indicated commercial entity operates.

II - DTE Stockton received confirmation from this company/agency indicating that they track REC transactions by utilizing the Green-e systems. As noted above, the confirmation received from Green-e Energy indicated that Renewable Energy Credits generated by DTE Stockton listed in Table 2 were not sold, traded, or otherwise transferred to any individual or entity or used to satisfy the renewable energy program(s) in which the indicated commercial entity operates.

III - DTE Stockton received communication from Nexant indicating that they do not broker or transact RECs in the voluntary market.

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DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

Maine Public Utilities Commission
Attention: Mitchell Tannenbaum
18 State House Station
Augusta, ME 04333

Dear Mr. Tannenbaum

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

In order for DTE Stockton (a.k.a. Stockton Biomass) to receive valid REC certificates, the Company must satisfy the conditions contained within the California Energy Commission ("CEC") Resolution No. 14-1007-10 as part of California's RPS program. That resolution states that a letter from the administrator of each state regulatory or voluntary program must attest that the RECs generated for the specified period, have not been sold, traded, or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program.

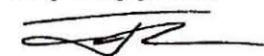
This letter requests to confirm the amounts listed in Table 1 (attached), were not sold, traded or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program by your state agency.

Please sign, date and then email your response directly to martin.olejnik@plantemoran.com. You may also fax it to (248) 603-5810 or mail it to:

Plante Moran LLP
Attn: Martin J. Olejnik
P.O. Box 307
Southfield, MI 48037

Your prompt response to this request will be appreciated.

Very truly yours,



John Reis
Director – Assets
DTE Energy Services - Wholesale Power & Renewables

Table 1:

RECs generated from November 1, 2013 through March 31, 2014:

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By: _____
(Printed Name)

(Signature)

(Title)

(Date)

MAINE

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____ Other – If for regulatory or process management reasons, DTE Stockton, LLC should contact another party in reference to this matter please include the name and contact information below:

MAINE

By: Mitchell Tannenbaum
(Printed Name)

MTal
(Signature)

General Counsel
(Title)

7/13/15
(Date)

DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

Nevada Public Utilities Commission – PEC Administrator
Attention: Darci Dalessio
1150 E William Street
Carson City, NV 89701

Dear Ms. Dalessio,

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

In order for DTE Stockton (a.k.a. Stockton Biomass) to receive valid REC certificates, the Company must satisfy the conditions contained within the California Energy Commission ("CEC") Resolution No. 14-1007-10 as part of California's RPS program. That resolution states that a letter from the administrator of each state regulatory or voluntary program must attest that the RECs generated for the specified period, have not been sold, traded, or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program.

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John Reis
Director – Assets
DTE Energy Services - Wholesale Power & Renewables

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By: _____
(Printed Name)

(Signature)

(Title)

(Date)

NEVADA

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NEVADA

By: Darci Dalessio
(Printed Name)

Darci Dalessio
(Signature)

PEC Administrator
(Title)

7/20/2015
(Date)

DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

Kansas Corp Comm – Economic Policy & Planning
Attention: Jon Wilson
1500 SW Arrowhead Rd
Topeka, KS 66604

Dear Mr. Wilson,

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

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Your prompt response to this request will be appreciated.

Very truly yours,


John Reis

Director – Assets
DTE Energy Services - Wholesale Power & Renewables

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(Printed Name)

(Signature)

(Title)

(Date)

KANSAS

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KANSAS

By: Jon Wilson
(Printed Name)

J. Wilson
(Signature)

Research Economist
(Title)

7-23-2015
(Date)

DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

Illinois Power Agency
Attention: Mr. Anthony Star
160 North LaSalle, Suite C-504
Chicago IL 60601

Dear Mr. Star,

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

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Your prompt response to this request will be appreciated.

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DTE Energy Services - Wholesale Power & Renewables

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By: _____
(Printed Name)

(Signature)

(Title)

(Date)

ILLINOIS

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ILLINOIS

By: Anthony Star
(Printed Name)
Anthony Star
(Signature)
Director
(Title)
7/24/15
(Date)

DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

Ohio Public Utilities Commission
Attention: Stuart Siegfried
180 East Broad St
Columbus, OH 43215-3793

Dear Mr. Siegfried,

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

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Plante Moran LLP
Attn: Martin J. Olejnik
P.O. Box 307
Southfield, MI 48037

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Director - Assets
DTE Energy Services - Wholesale Power & Renewables

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_____.

By: _____
(Printed Name)

(Signature)

(Title)

(Date)

OHIO

From: Stuart.Siegfried@puc.state.oh.us
To: [Dan Westrick](#)
Subject: RE: DTE Energy Services - CEC REC Confirmation
Date: Monday, July 27, 2015 12:10:07 PM
Attachments: [image002.png](#)
[image004.png](#)

Good morning Dan,

For RECs or S-RECs to count towards Ohio's RPS, they must originate from renewable facilities certified by the Commission. To date, the Commission has not certified any California facilities (including the DTE Stockton biomass facility cited in your letter) and therefore the RECs from such facilities would not be recognized under the renewable regulatory program.

As for any voluntary product offerings, we have not historically maintained details on the resources used to support the voluntary products – therefore, I cannot comment on that aspect of your inquiry.

Thank you,

Stuart M. Siegfried

Public Utilities Commission of Ohio
Energy & Environment Department
Efficiency & Renewables Division
Environmental Specialist
(614) 466-7536
PUCO.ohio.gov



This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

From: Dan Westrick [<mailto:Dan.Westrick@plantemoran.com>]
Sent: Monday, July 20, 2015 10:06 AM
To: Siegfried, Stuart
Subject: FW: DTE Energy Services - CEC REC Confirmation

Hi Stuart,

I am following up on our initial confirmation request. Can you please provide a response at your earliest convenience?

Thanks,

Dan Westrick, CPA | Assurance
Planta Moran, 27400 Northwestern Highway, Southfield, MI 48034
Direct Dial: 248.223.3854 | Fax: 248.233.8921

OHIO

From: Daryl Walker
Sent: Monday, July 13, 2015 11:43 AM
To: Stuart.Siepfried@puc.state.oh.us
Cc: Dan Westrick; Ali Hijazi
Subject: DTE Energy Services - CEC REC Confirmation

Hello,

I am an auditor from Plante Moran, PLLC and we have been engaged by DTE Energy Services to perform confirmation procedures related to the sale of Renewable Energy Credits. Please find the confirmation letter attached.

Please send your response as soon as possible to Martin Olejnik (Martin.Olejnik@plantemoran.com) as well as Dan Westrick (Dan.Westrick@plantemoran.com) as Martin will be traveling out of town for the next few days. You may also fax it to 248-233-8921 or mail it to:

Plante Moran LLP
ATTN: Dan Westrick
P.O. Box 307
Southfield, MI 48037

Thank you,

Daryl D. Walker, CPA | Assurance
Plante Moran, 27400 Northwestern Highway, Southfield, MI 48034
Phone: 248.223.3557 | Fax: 248.233.8968

[Plante Moran](#) | [Twitter](#) | [Facebook](#) | [LinkedIn](#) | [Blogs](#)

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DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

South Dakota Public Utilities Commission
Attention: Mr. Brian Rounds
500 East Capitol Ave
Capitol Building, 1st floor
Pierre, SD 57501

Dear Mr. Rounds,

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

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By: _____
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(Signature)

(Title)

(Date)

S. DAKOTA

Table 1:

RECs generated from November 1, 2013 through March 31, 2014:


Test Power (November 1, 2013 through February 20th, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
November 2013	3,677	DTE Stockton	60964A	W3540
December 2013	9,144	DTE Stockton	60964A	W3540
January 2014	9,667	DTE Stockton	60964A	W3540
February 2014	13,470	DTE Stockton	60964A	W3540

Commercial Operation (February 21st through March 31st, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
February 2014	7,616	DTE Stockton	60964A	W3540
March 2014	24,647	DTE Stockton	60964A	W3540

Please check one of the following responses:

☒ **AS MODIFIED**
 I acknowledge that the Renewable Energy Credits generated by DTE Stockton above were not sold, traded, or otherwise transferred to any individual or entity or used to satisfy the renewable energy program(s) which your state agency regulates and monitors for compliance. 

☐ **Other** – If RECs generated by DTE Stockton above were sold, traded or transferred, please provide the name(s) and address(es) of other individuals and entities and the corresponding amounts, vintages, and transaction dates of the transferred renewable energy credits.

☐ **Other** – If for regulatory or process management reasons, DTE Stockton, LLC should contact another party in reference to this matter please include the name and contact information below:

S. DAKOTA

By: Brian P. Rounds
(Printed Name)

B. P. P.
(Signature)

Analyst
(Title)

8/7/15
(Date)

DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

Michigan Public Service Commission – Electric Reliability Division
Renewable Energy Section
Attention: Katie Traxel
PO Box 30221
Lansing, MI 48909

Dear Ms. Traxel,

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

In order for DTE Stockton (a.k.a. Stockton Biomass) to receive valid REC certificates, the Company must satisfy the conditions contained within the California Energy Commission ("CEC") Resolution No. 14-1007-10 as part of California's RPS program. That resolution states that a letter from the administrator of each state regulatory or voluntary program must attest that the RECs generated for the specified period, have not been sold, traded, or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program.

This letter requests to confirm the amounts listed in Table 1 (attached), were not sold, traded or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program by your state agency.

Please sign, date and then email your response directly to martin.olejnik@plantemoran.com. You may also fax it to (248) 603-5810 or mail it to:

Plante Moran LLP
Attn: Martin J. Olejnik
P.O. Box 307
Southfield, MI 48037
Your prompt response to this request will be appreciated.

Very truly yours,



John Reis
Director – Assets
DTE Energy Services - Wholesale Power & Renewables

Table 1:

RECs generated from November 1, 2013 through March 31, 2014:

Test Power (November 1, 2013 through February 20th, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
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March 2014	24,647	DTE Stockton	60964A	W3540

Please check one of the following responses:

_____ I acknowledge that the Renewable Energy Credits generated by DTE Stockton above were not sold, traded, or otherwise transferred to any individual or entity or used to satisfy the renewable energy program(s) which your state agency regulates and monitors for compliance.

_____ Other – If RECs generated by DTE Stockton above were sold, traded or transferred, please provide the name(s) and address(es) of other individuals and entities and the corresponding amounts, vintages, and transaction dates of the transferred renewable energy credits.

_____ Other – If for regulatory or process management reasons, DTE Stockton, LLC should contact another party in reference to this matter please include the name and contact information below:

By: _____
(Printed Name)

(Signature)

(Title)

(Date)

MICHIGAN

Table 1:

RECs generated from November 1, 2013 through March 31, 2014:

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_____ Other – If for regulatory or process management reasons, DTE Stockton, LLC should contact another party in reference to this matter please include the name and contact information below:

MICHIGAN

Stockton is not found as a registered project or import project in MIRECS. In addition, no CA generating units have been used for MI RPS compliance. It is not known if assets or attributes from this generator have been sold to a MI electric provider.

(Printed Name)

Katie Trachsel ~~Katie Trachsel~~

(Signature)

CPA, MIRECS program manager

(Title)

July 22, 2015

(Date)

DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

Massachusetts Department of Energy Resources
Attention: Mr. Mike Judge
100 Cambridge St, Suite 1020
Boston, MA 02114

Dear Mr. Judge,

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

In order for DTE Stockton (a.k.a. Stockton Biomass) to receive valid REC certificates, the Company must satisfy the conditions contained within the California Energy Commission ("CEC") Resolution No. 14-1007-10 as part of California's RPS program. That resolution states that a letter from the administrator of each state regulatory or voluntary program must attest that the RECs generated for the specified period, have not been sold, traded, or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program.

This letter requests to confirm the amounts listed in Table 1 (attached), were not sold, traded or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program by your state agency.

Please sign, date and then email your response directly to martin.olejnik@plantemoran.com. You may also fax it to (248) 603-5810 or mail it to:

Plante Moran LLP
Attn: Martin J. Olejnik
P.O. Box 307
Southfield, MI 48037
Your prompt response to this request will be appreciated.

Very truly yours,

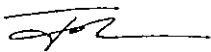

John Reis
Director -- Assets
DTE Energy Services - Wholesale Power & Renewables

Table 1:

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_____ Other – If RECs generated by DTE Stockton above were sold, traded or transferred, please provide the name(s) and address(es) of other individuals and entities and the corresponding amounts, vintages, and transaction dates of the transferred renewable energy credits.

_____ Other – If for regulatory or process management reasons, DTE Stockton, LLC should contact another party in reference to this matter please include the name and contact information below:

By: _____
(Printed Name)

(Signature)

(Title)

(Date)

MASSACHUSETTS

Table 1:

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Please check one of the following responses:

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☐ Other – If for regulatory or process management reasons, DTE Stockton, LLC should contact another party in reference to this matter please include the name and contact information below:

MASSACHUSETTS

By: Michael Judge
(Printed Name)

Michael Judge
(Signature)

Asst. RPS Program Manager
(Title)

7/21/15
(Date)

DTE Stockton, LLC

414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
(734) 302-4800; Fax (734) 302-4802

July 10, 2015

Montana Public Service Commission
Attention: Margo Sherman
1701 Prospect Ave - Vista Building
Helena, MT 59620

Dear Ms. Sherman,

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

In order for DTE Stockton (a.k.a. Stockton Biomass) to receive valid REC certificates, the Company must satisfy the conditions contained within the California Energy Commission ("CEC") Resolution No. 14-1007-10 as part of California's RPS program. That resolution states that a letter from the administrator of each state regulatory or voluntary program must attest that the RECs generated for the specified period, have not been sold, traded, or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program.

This letter requests to confirm the amounts listed in Table 1 (attached), were not sold, traded or otherwise transferred to any other individual or entity or used to satisfy any state regulatory or voluntary program by your state agency.

Please sign, date and then email your response directly to martin.olejnik@plantemoran.com. You may also fax it to (248) 603-5810 or mail it to:

Plante Moran LLP
Attn: Martin J. Olejnik
P.O. Box 307
Southfield, MI 48037

Your prompt response to this request will be appreciated.

Very truly yours,



John Reis
Director - Assets
DTE Energy Services - Wholesale Power & Renewables

Table 1:

RECs generated from November 1, 2013 through March 31, 2014:

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Please check one of the following responses:

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_____ Other – If for regulatory or process management reasons, DTE Stockton, LLC should contact another party in reference to this matter please include the name and contact information below:

By: _____
(Printed Name)

(Signature)

(Title)

(Date)

MONTANA

Table 1:

RECs generated from November 1, 2013 through March 31, 2014:

Test Power (November 1, 2013 through February 20th, 2014):

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February 2014	7,616	DTE Stockton	60964A	W3540
March 2014	24,647	DTE Stockton	60964A	W3540

Please check one of the following responses:

☒ I acknowledge that the Renewable Energy Credits generated by DTE Stockton above were not sold, traded, or otherwise transferred to any individual or entity or used to satisfy the renewable energy program(s) which ~~your state~~ agency regulates and monitors for compliance.
The Montana Public Service Commission

☐ Other – If RECs generated by DTE Stockton above were sold, traded or transferred, please provide the name(s) and address(es) of other individuals and entities and the corresponding amounts, vintages, and transaction dates of the transferred renewable energy credits.

☐ Other – If for regulatory or process management reasons, DTE Stockton, LLC should contact another party in reference to this matter please include the name and contact information below:

MONTANA

By: Robert Decker
(Printed Name)

Robert Decker
(Signature)

Chief, Public Policy Bureau, Montana Public Service Commission
(Title)

August 6, 2015
(Date)



Oregon

Kate Brown, Governor

November 16, 2015

Department of Energy

625 Marion St NE

Salem, OR 97301-3742

Phone: 503-378-4040

Toll Free: 1-800-221-8035

FAX: 503-373-7806

www.oregon.gov/energy



John Reis
DTE Stockton, LLC
414 South Main Street
Suite 600
Ann Arbor, Michigan 48104

RE: Retroactive REC Creation for DTE Stockton March 2013 – March 2014

Dear Mr. Reis,

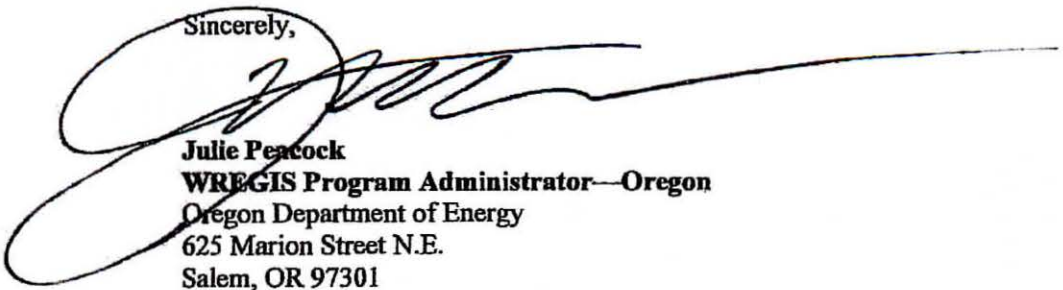
This letter is in response to a request the Department received on Nov. 12, 2015, to confirm that no entities have used Renewable Energy Certificates (RECs) from DTE Stockton identified in the chart below to comply with the Oregon Renewable Portfolio Standard.

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
November 2013	3,677	DTE Stockton	60964A	W3540
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February 2014	13,470	DTE Stockton	60964A	W3540
February 2014	7,616	DTE Stockton	60964A	W3540
March 2014	24,647	DTE Stockton	60964A	W3540

Per Oregon Administrative Rule (OAR) 330-160-0020, RECs used for Oregon RPS compliance must be generated by the Western Renewable Energy Generation Information System (WREGIS). OAR 330-160-0020 (1) *Renewable energy certificates that are issued, monitored, accounted for and transferred by or through the regional renewable energy certificate system and trading mechanism known as the Western Renewable Energy Generation Information System (WREGIS) shall be the only renewable energy certificates that can be used by an electric utility or electricity service supplier to establish compliance with the Oregon Renewable Portfolio Standard (RPS). Attestations or other forms of attributions are not valid compliance mechanisms.*

The Department has reviewed its records of Oregon certified WREGIS generating units as well as records of RPS compliance filings and confirms that no WREGIS RECs related to DTE Stockton have been used to satisfy compliance requirements as of Nov. 16, 2015.

Sincerely,


Julie Peacock
WREGIS Program Administrator—Oregon
Oregon Department of Energy
625 Marion Street N.E.
Salem, OR 97301
desk: 503.373.2125



FW: DTE Energy Services - CEC REC Confirmation

Dan Westrick to Debora Francis

On: "reisj@dteenergy.com"

07/29/2015 02:35 PM

From: Blackmon, Glenn (COM) [mailto:glenn.blackmon@commerce.wa.gov]

Sent: Wednesday, July 29, 2015 12:25 PM

To: Dan Westrick; Martin Olejnik

Subject: RE: DTE Energy Services - CEC REC Confirmation

Dear Mr. Westrick and Mr. Olejnik,

I am the WREGIS state administrator for Washington. I have reviewed the compliance document that you submitted and am unable to provide the specific certification that you request. However, there is no reason to believe that any RECs from DTE Stockton facility have been used in compliance with the Washington RPS (RCW 19.285.040 or the Energy Independence Act).

The Washington RPS does not require that utilities provide the WREGIS state administrator with access to the utility compliance reports. As a result, we are unable to verify the specific RECs that are retired for compliance purposes by some Washington utilities. Each utility reports the specific resources and RECs that it uses for compliance, and no utility has reported using environmental attributes from DTE Stockton for compliance in 2012, 2013, or 2014.

The Washington RPS limits eligible renewable resources to those located (or directly interconnected to utilities) in the Pacific Northwest, excluding California. RECs or environmental attributes from the DTE Stockton facility are not, as a matter of law, valid for compliance with the Washington RPS.

In my opinion, these facts should be sufficient to conclude that the Stockton DTE RECs have not been used to comply with the Washington RPS. However, as noted above, I am unable to provide the specific certification that you request.

Sincerely,

Glenn Blackmon
WREGIS State Program Administrator
WA Department of Commerce – State Energy Office
Olympia, WA
360 725-3115

From: Dan Westrick [mailto:Dan.Westrick@plantemoran.com]

Sent: Monday, July 20, 2015 7:29 AM
To: Blackmon, Glenn (COM)
Subject: DTE Energy Services - CEC REC Confirmation

Hi Glenn,

I am an auditor from Plante Moran, PLLC and we have been engaged by DTE Energy Services to perform confirmation procedures related to the sale of Renewable Energy Credits. Please find the confirmation letter attached.

Please send your response as soon as possible to Martin Olejnik (Martin.Olejnik@plantemoran.com) as well as Dan Westrick (Dan.Westrick@plantemoran.com) as Martin will be traveling out of town for the next few days. You may also fax it to 248-233-8921 or mail it to:

Plante Moran LLP
ATTN: Dan Westrick
P.O. Box 307
Southfield, MI 48037

Thank you,

Dan Westrick, CPA | Assurance
Plante Moran, 27400 Northwestern Highway, Southfield, MI 48034
Direct Dial: 248.223.3854 | Fax: 248.233.8921

This email, including any attachments, may contain confidential information and is intended solely for use by the individual to whom it is addressed. If you received this email in error, please notify the sender, do not disclose its contents to others, and delete it from your system. Any other use of this email and/or attachments is prohibited. This message is not meant to constitute an electronic signature or intent to contract electronically.

Audit Support Attachments

1. **DTE Stockton Request for Retroactive RECS – Dated Oct 6th 2015**
2. **Stockton Audit Report**
3. **REC Confirmation Letters**
 - A. Confirmations to State Agencies – (See Report Table 1c Note II and III)
 - B. Tracking System Confirmations (See Report Table 1c Note IV and V)
 - a. WREGIS
 - b. MRETS
 - c. NCRETS
 - d. NAR
 - e. NEPOOL
 - C. Confirmations to Voluntary Agencies – (See Report Table 4)
4. **Accounting Documentation**
 - A. Cash Receipt Reconciliation to Invoice Support
 - B. Electric Revenue Reconciliation to Invoice Support
 - C. Misc Revenue Reconciliation to Cash Receipts



RE: DTE Stockton - Confirm for WREGIS

Frantz, Mary to: Martin Olejnik
Cc: James Howard, "Reis, John"

12/18/2015 12:59 PM

Martin,

As of today, December 18, 2015, WREGIS GU ID W3540, has not been issued WREGIS certificates for vintages November 2013 through and including March 2014.

Kind regards,

Mary J. Frantz

Senior Program Analyst, WREGIS
Western Electricity Coordinating Council
155 North 400 West, Suite 200
Salt Lake City, Utah 84103-1114
801-883-6869
888-225-4213
mfrantz@wecc.biz
www.wecc.biz
www.wregis.org

THIS COMMUNICATION IS INTENDED SOLELY FOR THE ADDRESSEE AND MAY CONTAIN CONFIDENTIAL INFORMATION. Access to this email by anyone else, unless expressly approved by the sender or an authorized addressee, is unauthorized. If you are not the intended recipient(s), or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any dissemination, distribution or copying of this email message is strictly prohibited. If you have received this message in error, please immediately notify the sender, delete this email message from your computer, and destroy all copies.

From: Martin Olejnik [mailto:Martin.Olejnik@plantemoran.com]
Sent: Thursday, December 17, 2015 3:55 PM
To: Frantz, Mary
Cc: James Howard; Reis, John
Subject: Fwd: DTE Stockton - Confirm for WREGIS

Mary,

Per email that is attached, could you respond directly to my email with the information requested?

Thank you for your assistance,

Martin J. Olejnik, CPA | Partner

Plante Moran, 27400 Northwestern Highway, Southfield, MI 48037
Direct Dial: 248.223.3662 | Fax: 248.603.5810

Begin forwarded message:

From: John C Reis <reisj@dteenergy.com>
Date: December 17, 2015 at 5:41:55 PM EST
To: Martin Olejnik <Martin.Olejnik@plantemor.com>
Cc: James A Howard <howardj2@dteenergy.com>, "Frantz, Mary" <mfrantz@wecc.biz>
Subject: DTE Stockton - Confirm for WREGIS
(See attached file: Scanned From_ AMB-414-7TH-FLOOR.pdf)

Martin,

Attached is the confirm request for WREGIS. Please forward to Mary Franz for her confirmation that RECs were not created for DTE Stockton. Due to the urgent nature, please have her respond via email directly to you.

The following is Mary's contact information:

Mary J. Frantz
Senior Program Analyst, WREGIS
Western Electricity Coordinating Council
155 North 400 West
Suite 200
Salt Lake City, Utah 84103-1114
801-883-6869
888-225-4213
mfrantz@wecc.biz

Regards,

John
Director, Asset Management
Wholesale Power & Renewables
DTE Energy Services

734.302.4836 (office)
734.604.0064 (cell)

This email, including any attachments, may contain confidential information and is intended solely for use by the individual to whom it is addressed. If you received this email in error, please notify the sender, do not disclose its contents to others, and delete it from your system. Any other use of this email and/or attachments is prohibited. This message is not meant to constitute an electronic signature or intent to contract electronically.

DTE Stockton, LLC

December 17, 2015

We are currently in the process of requesting the California Energy Commission to authorize the creation of retroactive renewable energy credits ("RECs"), consistent with WREGIS Operating Rules. These include RECS generated by DTE Stockton, a biomass facility located in Stockton, CA with a nameplate capacity of 50 MW, as part of test power from November 1, 2013 to February 20, 2014, and RECs generated as part of power generated subsequent to commercial operations up to March 31, 2014.

In order for DTE Stockton (a.k.a. Stockton Biomass) to receive valid REC certificates, the Company must satisfy the conditions contained within the California Energy Commission ("CEC") Renewable Portfolio Standard Eligibility Guidebook, 8th Edition.

This letter is a request to confirm that the amounts listed in Table 1 (attached), were not created within the WREGIS system.

Please respond via email directly to Plante Moran LLP, Attn: Martin Olejnik (Martin.Olejnik@plantemoran.com).

Your prompt response to this request will be appreciated.

Very truly yours,



John Reis
Director – Assets
DTE Energy Services - Wholesale Power & Renewables

Table 1:

RECs generated from November 1, 2013 through March 31, 2014:

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February 2014	7,616	DTE Stockton	60964A	W3540
March 2014	24,647	DTE Stockton	60964A	W3540

_____ I acknowledge that the Renewable Energy Credits were not created for DTE Stockton (aka Stockton Biomass) per Table 1 above.

Comments:

By: _____
(Printed Name)

(Signature)

(Title)

(Date)



RE: DTE Stockton RECs - M-RETS
Bryan Gower to: John C Reis

01/12/2016 08:59 AM

John

I have verified that DTE Stockton has not been registered in M-RETS using the MRETS Generators Public Report

DTE Stockton RECs have never been imported into M-RETS.

Please let me know if I can be of any further assistance.

Thank you



Bryan Gower,
M-RETS Program Administrator, APX
Raleigh, NC
408-899-3340
bgower@apx.com

From: John C Reis [mailto:reisj@dteenergy.com]
Sent: Tuesday, January 12, 2016 8:52 AM
To: Bryan Gower
Subject: Fw: DTE Stockton RECs - M-RETS

Bryan,

I am following up on our earlier conversation. I am trying to confirm that our DTE Stockton, LLC (aka Stockton Biomass) located at 2526 W. Washington Street, Stockton, CA 95203 did not issue, sell or transfer any Renewable Energy Credits through M-RETS. The following tables indicate the specific vintage and quantities in question:

Test Power (November 1, 2013 through February 20th, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
November 2013	3,677	DTE Stockton	60964A	W3540
December	9,144	DTE Stockton	60964A	W3540

2013 January	9,667	DTE Stockton	60964A	W3540
2014 February	13,470	DTE Stockton	60964A	W3540
2014				

Commercial Operation (February 21st through March 31st, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
February 2014	7,616	DTE Stockton	60964A	W3540
March 2014	24,647	DTE Stockton	60964A	W3540

Any guidance or confirmation regarding the plant's registration in the M-RETS and/or transfer of RECs that you can provide would be appreciated. Please do not hesitate to call (or email) me should you have additional questions.

Best Regards,

John Reis
Director, Asset Management
Wholesale Power & Renewables
DTE Energy Services

734.302.4836 (office)
734.604.0064 (cell)



RE: DTE Stockton RECs - NC-RETS
Bryan Gower to: John C Reis

01/12/2016 09:10 AM

History:

This message has been replied to.

John

I have verified that DTE Stockton has not been registered in NC-RETS using the NC RETS Project Public Report

DTE Stockton RECs have never been Imported into NC-RETS.

Please let me know if I can be of any further assistance.

Thank you



APX

Energy. Environment. Market Integrity.

Bryan Gower,
NC-RETS Program Administrator, APX
Raleigh, NC
888-378-4461
bgower@apx.com

From: John C Reis [mailto:reisj@dteenergy.com]
Sent: Tuesday, January 12, 2016 8:50 AM
To: Bryan Gower
Subject: DTE Stockton RECs - NC-RETS

Bryan,

I am following up on our earlier conversation. I am trying to confirm that our DTE Stockton, LLC (aka Stockton Biomass) located at 2526 W. Washington Street, Stockton, CA 95203 did not issue, sell or transfer any Renewable Energy Credits through NC-RETS. The following tables indicate the specific vintage and quantities in question:

Test Power (November 1, 2013 through February 20th, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
November 2013	3,677	DTE Stockton	60964A	W3540
December	9,144	DTE Stockton	60964A	W3540

2013 January	9,667	DTE Stockton	60964A	W3540
2014 February	13,470	DTE Stockton	60964A	W3540
2014				

Commercial Operation (February 21st through March 31st, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
February 2014	7,616	DTE Stockton	60964A	W3540
March 2014	24,647	DTE Stockton	60964A	W3540

Any guidance or confirmation regarding the plant's registration in the NC-RETS and/or transfer of RECs that you can provide would be appreciated. Please do not hesitate to call (or email) me should you have additional questions.

Best Regards,

John Reis
Director, Asset Management
Wholesale Power & Renewables
DTE Energy Services

734.302.4836 (office)
734.604.0064 (cell)



RE: DTE Stockton RECs - NAR

Bao Ngo to: John C Reis

Cc: Bryan Gower, NARAdmin

01/11/2016 10:37 AM

History:

This message has been replied to.

John,

I confirm that DTE Stockton, LLC (aka Stockton Biomass) located at 2526 W. Washington Street, Stockton, CA 95203 did not issue, sell or transfer any Renewable Energy Credits through NAR. We don't have any records of Imports or Project registration for this project.



Bao Ngo

NAR Registry Administrator

APX Environmental Markets

Telephone: 1-408-899-3341

Email: NAR@apx.com

URL: <http://narecs.com>

From: John C Reis [<mailto:reisj@dteenergy.com>]

Sent: Friday, January 08, 2016 2:21 PM

To: Bao Ngo

Cc: Bryan Gower

Subject: Re: DTE Stockton RECs - NAR

Bao,

I spoke with Bryan Gower earlier today and he mentioned that you were the North American Renewables Registry (NAR) Administrator. I am trying to confirm that our DTE Stockton, LLC (aka Stockton Biomass) located at 2526 W. Washington Street, Stockton, CA 95203 did not issue, sell or transfer any Renewable Energy Credits through NAR. The following tables indicate the specific vintage and quantities in question:

Test Power (November 1, 2013 through February 20th, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
November 2013	3,677	DTE Stockton	60964A	W3540
December 2013	9,144	DTE Stockton	60964A	W3540

January 2014	9,667	DTE Stockton	60964A	W3540
February 2014	13,470	DTE Stockton	60964A	W3540

Commercial Operation (February 21st through March 31st, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
February 2014	7,616	DTE Stockton	60964A	W3540
March 2014	24,647	DTE Stockton	60964A	W3540

Any guidance or confirmation regarding the plant's registration in the NAR and/or transfer of RECs that you can provide would be appreciated. Please do not hesitate to call (or email) me should you have additional questions.

Best Regards,

John Reis
Director, Asset Management
Wholesale Power & Renewables
DTE Energy Services

734.302.4836 (office)
734.604.0064 (cell)



Re: DTE Stockton RECs - NEPOOL GIS
James Webb to: John C Reis
Cc: Bryan Gower

01/08/2016 07:50 PM

History:

This message has been replied to.

Hello John, since the NEPOOL GIS does not allow for the registration of generators located in California, I can confirm the Stockton Biomass project is not registered in the NEPOOL GIS, nor were RECs issued or transferred in the NEPOOL GIS.

James Webb
408.517.2174
jwebb@apx.com

From: John C Reis <reisj@dteenergy.com>
Sent: Friday, January 8, 2016 2:16 PM
To: James Webb
Cc: Bryan Gower
Subject: Re: DTE Stockton RECs - NEPOOL GIS

James,

I spoke with Bryan Gower earlier today and he mentioned that you were the NEPOOL GIS Administrator. I am trying to confirm that our DTE Stockton, LLC (aka Stockton Biomass) located at 2526 W. Washington Street, Stockton, CA 95203 did not issue, sell or transfer any Renewable Energy Credits through NEPOOL GIS. The following tables indicate the specific vintage and quantities in question:

Test Power (November 1, 2013 through February 20th, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
November 2013	3,677	DTE Stockton	60964A	W3540
December 2013	9,144	DTE Stockton	60964A	W3540
January 2014	9,667	DTE Stockton	60964A	W3540
February 2014	13,470	DTE Stockton	60964A	W3540

Commercial Operation (February 21st through March 31st, 2014):

Vintage	Amount	Plant Name	CEC	WREGIS
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Month	of RECs	RPS-ID#	GUID #
February 2014	7,616 DTE Stockton	60964A	W3540
March 2014	24,647 DTE Stockton	60964A	W3540

Any guidance or confirmation regarding the plant's registration in the NEPOOL GIS and/or transfer of RECs that you can provide would be appreciated. Please do not hesitate to call (or email) me should you have additional questions.

Best Regards,

John Reis
 Director, Asset Management
 Wholesale Power & Renewables
 DTE Energy Services

734.302.4836 (office)
 734.604.0064 (cell)

Audit Support Attachments

1. **DTE Stockton Request for Retroactive RECS – Dated Oct 6th 2015**
2. **Stockton Audit Report**
3. **REC Confirmation Letters**
 - A. Confirmations to State Agencies – (See Report Table 1c Note II and III)
 - B. Tracking System Confirmations (See Report Table 1c Note IV and V)
 - a. WREGIS
 - b. MRETS
 - c. NCRETS
 - d. NAR
 - e. NEPOOL
 - C. Confirmations to Voluntary Agencies – (See Report Table 4)
4. **Accounting Documentation**
 - A. Cash Receipt Reconciliation to Invoice Support
 - B. Electric Revenue Reconciliation to Invoice Support
 - C. Misc Revenue Reconciliation to Cash Receipts



CRS

center for
resource
solutions

March 2, 2015

John C. Reis
Director – Asset Management
414 South Main Street, Suite 600
Ann Arbor, Michigan 48104
Via: reisj@dteenergy.com

To whom it may concern,

The Center for Resource Solutions administers the Green-e Energy certification program. DTE Energy has requested that we review data on Green-e Energy certified sales in order to determine whether any Stockton Biomass (aka DTE Stockton) generation for which retroactive REC issuance has been requested in WREGIS has already been reported in a Green-e Energy certified sale.

Green-e has evaluated generation occurring between November 2013 and March 2014 at Stockton Biomass, WREGIS ID W3540, and listed in the table on the attached application. We find that such RECs have not been used in Green-e Energy certified sales through 2013. Please note, however, that we do not at this time have data on all certified sales for which the above period of generation is eligible, and so we cannot definitively evaluate the generation until a later time when verification is completed, which will be mid-2015 at the earliest. Green-e Energy staff will check subsequent verification data for the presence of Stockton Biomass RECs as soon as possible, and will notify you of our findings at that time, as well as the WREGIS System Administrator and any other entities impacted.

Sincerely,

Alex Pennock
Manager Green-e Energy
alex@resource-solutions.org



RECEIVED

FEB 27 2015

Green-e Energy Retroactive Renewable Energy Certificate Evaluation Form

I. Facility and Registration Information

Name of Generation Facility ("Facility"): DTE Stockton (aka - Stockton Biomass)

Renewable Resource Type (e.g. Wind, Solar, Geothermal): Biomass

Company or Person that Owns Facility ("Owner"): DTE Stockton, LLC

Address of Facility: 2526 West Washington Street, Stockton, CA 95203

North American Electricity Reliability Corporation (NERC) region in which Facility is located:¹ WECC

Tracking System in which Facility is registered ("Tracking System"): WREGIS

Facility Registration or ID Number within Tracking System: W3540

First Month and Year of Facility's Generation Tracked in Tracking System: April 2014

Facility ID²: 54238 ☒ EIA or ☐ QF? (check one)

Nameplate Capacity (MW): 50

Date Facility was First Operational: 2/21/2014 (COD)
10/25/13 (test power began)

Date of Capacity Upgrade: _____

Contact Name: John Reis

Title: Director - Asset Management

Telephone: (734) 302-4836

Email Address: reisj@dteenergy.com

II. Evaluation of Use within Green-e Energy Certified Products

Green-e will evaluate the RECs listed above to see if they have appeared in voluntary market verification for prior reporting years. At the conclusion of this evaluation we will provide a letter describing the outcome of the evaluation.

RECs eligible in calendar years of sale for which verification has not yet been completed cannot be definitively evaluated until a later time when verification is completed. Green-e staff will check for the appearance of the RECs where eligible in subsequent years' verification reporting data. If such RECs are identified we will notify the Facility listed above and the Tracking System Administrator as well as any others impacted by the potential double counting.

¹ If you are unsure of which region Facility is in, see <http://www.nerc.com/regional/>

² Enter Energy Information Administration (EIA) Identification number for the generating facility; if no EIA number, enter the utility-assigned Qualifying Facility (QF) Identification number

III. RECs to be Evaluated, and Fees

[illegible]

There is a flat facility fee of \$75 and an additional 0.5 cent/MWh volumetric fee for the evaluation. Receipt of the payment in full is required before evaluation of the RECs. Payment is not refundable, regardless of the outcome of the evaluation.

Total fee based on MWh to be evaluated ($\$75 + (0.05 * \text{"Total RECs" amount in table above})$):

\$416.11

Checks should be sent to: Center for Resource Solutions, 1012 Torney Avenue 2nd Floor, San Francisco, California 94129.

IV. Signature

As an authorized representative of Facility Owner, I hereby agree to the terms above:

[Handwritten signature]

Signature

2/26/15

Date _____

John Reis, Director - Asset Management
DTE Energy Services, Inc.
Name, Title, and Organization

Ann Arbor, Michigan
Place of Execution



CRS

center for
resource
solutions

January 14, 2016

John C. Reis
Director – Asset Management
414 South Main Street, Suite 600
Ann Arbor, MI 48104

To whom it may concern,

The Center for Resource Solutions administers the Green-e Energy certification program. DTE Energy has requested that we review data on Green-e Energy certified sales in order to determine whether any Stockton Biomass (aka DTE Stockton) generation for which retroactive REC issuance has been requested in WREGIS has already been reported in a Green-e Energy certified sale.

Green-e has evaluated generation occurring between November 2013 and March 2014 at Stockton Biomass, WREGIS IS W3540. We find that such RECs have not been used in Green-e Energy certified sales.

Sincerely,

Michael Leschke
Green-e Energy Analyst
michael.leschke@resource-solutions.org

1012 Lomey Avenue
2nd floor
San Francisco, CA 94129

tel 415.561.2100
fax 415.561.2105
web www.resource-solutions.org



DTE Stockton facility
Brooke Malik to: relsj

10/28/2015 02:56 PM

Hi John,

Thanks for your call today. I can confirm on 3Degrees' behalf that we have not purchased any RECs generated by your Stockton biomass facility.

Please let me know if you need anything else!

Thanks,

Brooke

--

BROOKE MALIK

Portfolio Manager

3degreesinc.com

407 Sansome St. 4 Fl

San Francisco, CA 94111

M: 408.219.4717

F: 415.886.3774

AIM: originationdesk



2015 EPA Green Power Supplier of the Year



DTE Stockton - Retroactive REC Letter

Keri Richardson Bevel to: reisj@dteenergy.com

Cc: Michael Taylor

11/11/2015 12:18 PM

History:

This message has been replied to.

1 attachment



DTE_Stockton.pdf

Hi John,

Pursuant to your request of Mike Taylor on October 27, 2015, please find the REC letter attached executed on behalf of Element Markets, LLC.

If you have any questions, please contact me at your convenience.

Many thanks and best regards,
Keri

Keri Richardson Bevel
Senior Vice President and General Counsel
Element Markets, LLC
(281) 207-7259 (office)
(713) 503-7583 (cell)
kbevel@elementmarkets.com

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Table 1:

RECs generated from November 1, 2013 through March 31, 2014:

Test Power (November 1, 2013 through February 20th, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
November 2013	3,677	DTE Stockton	60964A	W3540
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January 2014	9,667	DTE Stockton	60964A	W3540
February 2014	13,470	DTE Stockton	60964A	W3540

Commercial Operation (February 21st through March 31st, 2014):

Vintage Month	Amount of RECs	Plant Name	CEC RPS-ID#	WREGIS GUID #
February 2014	7,616	DTE Stockton	60964A	W3540
March 2014	24,647	DTE Stockton	60964A	W3540

Please check one of the following responses:

☒ The Renewable Energy Credits generated by DTE Stockton above were not sold, traded, or otherwise transferred to your entity for resale or transfer in the voluntary renewable energy credit market.

☐ Other – If RECs were sold, traded or transferred, please describe hereon

ELEMENT MARKETS, LLC

By:

Keri Bavel
(Name)

Corporate Secretary
(Title)

November 11, 2015
(Date)