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Document Title:	Memo Regarding DTE Stockton, LLC's Audit Report for the Creation of Retroactive Renewable Energy Credits
Description:	Memo to Executive Director Oglesby from Deputy Director Korosec regarding the audit report and request from DTE Stockton LLC for the creation of REC's in WREGIS for RPS certification
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Memorandum

To: Robert P. Oglesby
Executive Director

Date : February 23, 2016

Telephone: CALNET (XXX)
(XXX)

From : **California Energy Commission** - **Suzanne Korosec**
1516 Ninth Street
Sacramento CA 95814-5512
Deputy Director, Renewable Energy Division

Subject: DTE STOCKTON, LLC'S AUDIT REPORT FOR THE CREATION OF RETROACTIVE RENEWABLE ENERGY CREDITS IN WREGIS FOR RPS CERTIFICATION

This memo is in regard to DTE Stockton, LLC's audit report for the creation of retroactive renewable energy credits (RECs) in the Western Renewable Energy Generation Information System (WREGIS) for Renewables Portfolio Standard (RPS) certification for the DTE Stockton facility, RPS ID No. 60964A, WREGIS GU ID (Generating Unit Identification) W3540.

RPS staff recommends that the Executive Director accept the audit report and forward the report to WREGIS based on the documentation DTE Stockton, LLC submitted in the report as described below.

Audit Report for the DTE Stockton LLC Facilities

The audit report was prepared by an independent accountant or certified internal auditor in accordance with standards of the American Institute of Certified Public Accountants. Plante & Moran, PLLC performed the audit and included the findings, which confirmed that the RECs in question were not sold, traded, or otherwise transferred to any other individual or entity or used to satisfy another program.

Plante & Moran, PLLC determined that the RECs could qualify for the following states' programs: Arizona, Colorado, Illinois, Kansas, Maine, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nevada, New Mexico, North Carolina, North Dakota, Oregon, Ohio, Rhode Island, South Dakota, Utah, and Washington. Plante & Moran, PLLC received a letter from the administrator of each regulatory program or tracking system used by each state and confirmed that the RECs were not used to satisfy the program requirements for that state.

Additionally, it was confirmed that RECs could qualify under the following tracking systems: Western Renewable Energy Generation Information System (WREGIS), Midwest Renewable Energy Tracking System (M-RETS), North Carolina Renewable

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Energy Tracking System (NCRETS), North American Renewables Registry (NAR), New England Power Pool Generation Information System (NEPOOL GIS), and Green-e. A letter from the administrator of the tracking system used was received and confirmed the RECs were not used to satisfy the program requirements for that state.

Staff's Determination and Recommendation

Based on the supporting information provided by DTE Stockton, LLC, staff determined that DTE Stockton, LLC satisfied the requirements for the audit report. Therefore, staff recommends that the Executive Director accept the audit report for the creation of retroactive RECs in WREGIS for the DTE Stockton facility for the vintage months/years of November 2013 through March 2014.

If the Executive Director accepts DTE Stockton, LLC's audit report, staff will forward the audit report to WREGIS staff for their consideration and approval. The Energy Commission will request that WREGIS create the retroactive RECs consistent with the WREGIS Operating Rules Section 12.9 and invoice DTE Stockton, LLC for all costs and expenses incurred by WREGIS.

If you have any questions, please do not hesitate to contact me.



SUZANNE KOROSEC
Deputy Director, Renewable Energy Division

cc: Christina Crume
Gabe Herrera