

**DOCKETED**

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<b>Project Title:</b>	Amendments to Regulations Specifying Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities
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## **RPS-16-03 Disaggregated WREGIS Certificates**

RPS-16-03 Disaggregated WREGIS Certificates

Dear Energy Commission Commissioners,

My Contention:

If an WREGIS Account Holder wants to disaggregate (separate) some of the Renewable and Environmental Attributes contained in a WREGIS certificate, the Account Holder transfers the certificate to its Reserve Subaccount and then conducts transactions outside of WREGIS for the distinct subset of Renewable and Environmental Attributes. WREGIS is not designed to separately track any greenhouse gas or other emissions-related attributes.

The Reserve Subaccount is to be used in instances where the Renewable Energy Certificates may be used outside of WREGIS.

From a WREGIS standpoint, these Certificates will no longer be tracked, and WREGIS will make no claims as to the Certificate status.

An WREGIS Account Holder may request that the WREGIS Administrator withdraw WREGIS Certificate(s) from a Reserve Subaccount if all the following apply:

1. The WREGIS Certificate(s) was Reserved within three months of the date of the withdrawal request.
2. The Account Holder can demonstrate that the Reserved Certificate(s) has not yet been disaggregated and sold separately to a third party(ies).
3. The Account Holder can demonstrate that the Reserved WREGIS Certificate(s) has not yet been sold to a third party(ies).
4. The Account Holder can demonstrate that a legitimate error was made or a regulatory, legislative, or programmatic change occurred that is prompting the withdrawal.

Beyond tracking certificates, another goal of WREGIS is to protect against double or multiple counting of the same renewable energy.

Energy Commission Regulations do not have rules for the use of Reserve Subaccounts or for tracking WREGIS Certificates outside of WREGIS.

Lack of Energy Commission Regulations provide a opportunity for double or multiple counting of the same renewable energy.

My supporting argument:

Pursuant to PUC 399.21. (a) (1), The commission and the Energy Commission shall ensure that the tracking system established pursuant to subdivision (c) of Section 399.25, is operational, is capable of independently verifying that electricity earning the credit is generated by an eligible renewable energy resource, and can ensure that renewable energy credits shall not be double counted by any seller of electricity within the service territory of the WECC.

Pursuant to PUC 399.30. (n), The Energy Commission shall adopt regulations specifying procedures for enforcement of ARTICLE 16. California Renewables Portfolio Standard Program [399.11 - 399.33].

Action requested:

Rules for the use of Reserve Subaccounts and for tracking WREGIS Certificates outside of WREGIS are required for regulations to be complete.

Please see the rules for use of Disaggregated WREGIS Certificates are added to Title 20, Chapter 13. Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities to ensure that renewable energy credits shall not be double counted.

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