

DOCKETED

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*Comment Received From: Steve Uhler
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RPS-2021-01 double counting of renewable energy generation tracked within WREGIS

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WREGIS does not prevent double counting of renewable energy generation tracked within WREGIS, as Renewables Portfolio Standard Verification and Compliance Methodology Report, Third Edition TN247672 claims. See attached TN247672_20221123T113957_Renewables Portfolio Standard Verification and Compliance Methodology Repor.pdf

Perhaps the Energy Commission is favoring the LSE over the renewable energy end user in TN247672_20221123T113957_Renewables Portfolio Standard Verification and Compliance Methodology Repor.pdf as to ownership of the renewable energy?

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Additional submitted attachment is included below.

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WREGIS tracks the renewable and environmental attributes associated with renewable energy and has been tracking generation in the Western Interconnection and creating Certificates since June 25, 2007. The Renewable and Environmental Attributes are unbundled from the megawatt-hour (MWh) of renewable energy, or determined equivalent, produced and recorded onto a WREGIS Certificate. One WREGIS Certificate is created for each MWh or determined equivalent of renewable energy produced, and each WREGIS Certificate is assigned a unique serial number. See attached WREGIS Operating Rules October 2022 Final.pdf.

While WECC reserves the right to and will undertake reasonable efforts to ensure the ownership of Certificates in WREGIS is accurate, Customer agrees that WREGIS does not establish legal title to Certificates in any form. See attached WREGIS Terms of Use October 2022 Final.pdf.

WREGIS Operating Rules October 2022 Final claims, "To ensure that double-counting does not occur, Customers are attesting that 100% of their generation output from the registered meter will be reported to and tracked by WREGIS.". This does not ensure that double-counting of renewable energy generation does not occur.

WREGIS does not track ownership of renewable energy generation. Some tracking systems selling Renewable and Environmental Attributes of generation may be overlooked by WREGIS and the Energy Commission.

WREGIS tracks the renewable and environmental attributes associated with renewable energy. The Renewable and Environmental Attributes are unbundled from the megawatt-hour (MWh) of renewable energy. One WREGIS Certificate is created for each MWh or determined equivalent of renewable energy produced.

Perhaps the Energy Commission is favoring the LSE over the renewable energy end user in TN247672_20221123T113957_Renewables Portfolio Standard Verification and Compliance Methodology Repor.pdf as to ownership of the renewable energy?

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