

INDEPENDENT ENERGY PRODUCERS

March 31, 2015

Kristie Sharp, Chair
WREGIS Stakeholder Advisory Committee
WECC
155 North West, Suite 200
Salt Lake City, Utah 84103-1114

**RE: Proposed Changes to Weaken Registration and Data Standards Prescribed By
WREGIS Operating Rules, Section 9.3.3**

Dear Ms. Sharp:

On March 3, 2015, the WREGIS Stakeholder Advisory Committee (SAC) considered rule changes to enable the creation and tracking of WREGIS Renewable Energy Certificates (RECs) from renewable resources lacking sufficient metering to qualify for WREGIS registration under the WREGIS Operating Rules. As no action was taken during the meeting, the matter is expected to be on the next WREGIS SAC meeting agenda scheduled for April 7, 2015. The Independent Energy Producers (IEP) and the undersigned oppose the proposed rule changes.

This matter was presented to the WREGIS SAC by the Oregon Department of Energy (Oregon DOE). The Oregon DOE is requesting changes to the WREGIS operating rules. Specifically, Oregon DOE seeks the “flexibility under the WREGIS operating rules to register specified resources that do not have metering that meets the ANSI C-12 or equivalent standard, as currently described in Section 9.3.3 of the WREGIS Operating Rules.” Apparently, Oregon DOE in coordination with the Energy Trust in Oregon is proposing to use annual estimates of [REC] production that have been verified via *statistical analysis in lieu of* data from production meters.

This proposal is extremely misguided. Beginning with the initial formation of WREGIS, a critical goal was to design a system of REC registration/tracking that would instill public confidence that the RECs, representing the environmental attributes of the electric generation from a renewable resource, were *real*, i.e. a REC reflected a full MWh of production from an eligible renewable resource. Accordingly, state agencies, environmentalists, renewable resource operators, and traders collectively agreed to the foundational principle that WREGIS RECs must be metered to a high level of precision, and that those meter reads must be third-party verified. Estimation was not acceptable, irrespective of whether the estimation was by statistical procedures, surveys, or some other method. Parties recognized that the integrity of RPS programs would depend on the integrity of WREGIS’s procedures related to registration and tracking; and, thus, accurate meters were required, and third-party verification was imposed to prevent fraud, abuse, etc.

The Oregon DOE proposal conflicts with these foundational principles and goals. While the state of Oregon is free to use and/or count whatever resources it desires to meet its public policy objectives, the integrity of WREGIS RECs used across the WECC-region for purposes of RPS compliance and third-party verification need not and should not be undermined by enabling estimation techniques to supplant the current verification and tracking techniques in Section 9.3.3 of the WREGIS Operating Rules.

Accordingly, the parties listed below strongly oppose the Oregon DOE proposal.

Respectfully submitted,

A handwritten signature in black ink that reads "Steven Kelly". The signature is written in a cursive style with a large, sweeping "S" and a long, horizontal tail.

On behalf of the following entities:

Steven Kelly, Policy Director
Independent Energy Producers Association

Nancy Rader, Executive Director
California Wind Energy Association

Shannon Eddy, Executive Director
Large-scale Solar Association

Julee Malinowski Ball, Executive Director
California Biomass Energy Alliance

Robert Kahn, Executive Director
Northwest & Intermountain Power Producers Coalition

Greg Patterson, Executive Director
Arizona Competitive Power Alliance

Cc Mr. James Robb, Chief Executive Officer, WECC
Andrea Coon, Executive Director, WREGIS