



WREGIS Project - Change Control

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Change Request Form			
Project Request ID: 224 Status: Open	Requested by: Mike Muston Organization: Buena Vista Biomass Power	Type of Change: Operating Rules	Date Requested: 4/1/2014 Target Date: 6/2014 Priority: High
Title: Change Rule 12.9 to clarify payment and requirements for creation of retroactive certificates.			
<p>Description: Buena Vista Biomass Power (BVBP) is requesting a change in WREGIS operating rule 12.9, the WREGIS Retroactive Creation of Certificates rule, to clarify the payment that may be needed for retroactive creation of certificates, and the requirements that must be in place for such creation. Currently, Rule 12.9 only allows such requests from a state program or provincial program or similar program entity that requires retroactive certificate creation, and WREGIS reserves the right to require states and provinces to pay any necessary costs.</p> <p>This change will preserve the role of state and provincial programs and similar entities in requesting the creation of retroactive certificates. However, Rule 12.9 would be clarified in two ways: 1) the costs, if any, of a retroactive certificates request would be payable by any interested party, rather than limited to the requesting program; and 2) a program requirement that WREGIS be used for tracking generation after a date specific would be sufficient basis for a program to make a retroactive certificates request.</p> <p>This change would help ensure that renewable generation is counted for state and provincial programs in the first place, which will benefit the stakeholders in those programs by increasing participation and holding down costs. This is currently at times prevented by administrative authority and/or resource constraints at state and provincial entities, and this change will address those barriers.</p>			
APX Response:			



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Reason for Change: Need For New Structure For Issuance of Retroactive WREGIS Certificates

Consequences of Not Implementing Change: Potentially increased double counting due to generation not being tracked in WREGIS. Loss of eligible renewable energy (counting at least once) and commensurate financial impact to WREGIS stakeholders. Continued placement of administrative responsibility for deliverables under Rule 12.9 without adequate administrative authority or staffing/resourcing at state and provincial entities.

Estimate for Scheduled Release:

Cost Impact:

Total Cost Estimate:

Risk & Issues Involved:

External Impacts:



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Attachments/References: Suggested Rule 12.9 language

12.9 Retroactive Creation of Certificates

Retroactive creation of Certificates refers to the creation of Certificates for a past generation period for which WREGIS has no verified static data. This could occur when a Generating Unit registers in WREGIS in the middle of the year but is required to provide WREGIS Certificates for the entire year's production. It could also occur if a registered Generating Unit needs to provide Certificates for a generation period prior to the June 25, 2007 WREGIS Go Live date.

Automatic creation of retroactive Certificates is not part of the standard functionality of WREGIS. If creation of these Certificates is needed, this process will require action through the Change Control process. WREGIS will not have a time limit for which retroactive Certificate creation will be allowed, however, retroactive Certificate creation will only be allowed in WREGIS upon request from a state program or provincial program that requires tracking of generation in WREGIS after a date certain. The length of time for which retroactive Certificate creation will be allowed pursuant to such a state or provincial request will be dictated by the states or provinces that require it.

No Prior Period Adjustment will be allowed for the retroactive Certificates that were created, and retroactive Certificates cannot be created more than once for any single Generating Unit.

WREGIS reserves the right to require states and provinces that request retroactive Certificates, or other involved stakeholders, to pay for the cost associated with the additional WREGIS staff time and labor required for all work associated with retroactive Certificates including, but not limited to, entering and verifying data, and systems changes.

Approvals

APX: _____ Date: _____

WREGIS: _____ Date: _____



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Notes: