



# Oregon

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## **Explanation of the Oregon RPS Certification Process**

The Oregon Department of Energy (the Department) is responsible for administering the implementation “system” for compliance with the Renewable Portfolio Standard (RPS). The Department has selected the Western Renewable Energy Generation Information System (WREGIS) as the means for creating renewable energy certificates (RECs) and tracking compliance with the Standard.

Before renewable power can be used for compliance toward the Standard, the renewable power facility must be registered with WREGIS. Once the facility is registered, it must then receive Oregon eligibility certification from the Department. After a facility is certified, all RECs subsequently generated within WREGIS will indicate that they can be used for compliance with the Oregon RPS.

The Department has established a process to apply for Oregon certification. A standard General Application is required of all facilities, with supporting documentation. In instances where a particular type of renewable power project has complicated eligibility rules, such as biomass and hydropower, a supplementary application is required.

Rather than explain each section of the General Application within the application itself, this document is a supplement for Oregon RPS stakeholders to understand the purpose of the information requested.

### **Public Disclosure**

All applications submitted to the Department are subject to state public disclosure laws. The Department notifies the Applicant of this requirement, but we also prefer an application that does not contain sensitive information.

### **Section I: Type of Certification Requested**

The General Application can be used for all certification requests. This section requests the Applicant to indicate whether the application is *original*, if the Department has not yet certified the facility; *amended*, when a correction to a previously submitted application is required; or *renewal*, to extend the certification term for a previously certified facility.

### **Section II: Applicant Information**

In this section, the Applicant provides contact information to the Department. The Applicant should be the principal point of contact for all issues regarding certification. Once the facility is certified, the Applicant will receive the letter of certification.

If the Applicant is not affiliated with the facility or the facility owner, the Applicant must explain why it may file an application for the facility and provide documentation supporting that claim. Documentation can come in any form, including direct authorization from the facility owner. The Department uses this information to assure that the Applicant is authorized to file an application on behalf of another entity.

### **Section III: Facility Information**

This section requests general information about the facility and the facility owner. Listing alternate names and providing IDs and codes associated with the facility may help resolve confusion. Many renewable power facilities have similar names. One renewable power facility may have many names. The WREGIS ID is generally associated with each production meter at a facility, but it may also be an aggregation of solar projects.

If more information is associated with the facility than space allows in the form, the Applicant may attach a spreadsheet or additional paperwork to respond to the question.

### **Section IV: Facility Eligibility**

This section describes the facility's profile. First, the Applicant must point to the place in law where the facility is listed as eligible. This is to ensure that the Applicant has reviewed ORS 469A as legislatively amended and can highlight the appropriate standard for review.

Second, the Applicant must indicate significant features of the facility such as total power capacity and commercial operation date. These values will be important when certifying a facility. For example, the Department will indicate by letter the first eligible vintage (month/year) of RECs that may be used for Oregon compliance.

Third, the Applicant must indicate what renewable resource is used to generate the power. Where a facility uses multiple fuels, additional questions and a multi-fuel supplementary application are required. Per stakeholder request, we have added a question related to the Solar Photovoltaic Capacity Standard, so that the Department can incorporate that information into our certification letter.

### **Section V: Facility Employment Estimate**

The Department requests facility employment estimates from each Applicant. Under ORS 469A, Sec. 25, the Department is responsible for providing a study to the Legislature that evaluates the Renewable Portfolio Standard's impact on jobs in Oregon. In a report to the Legislature, the Department acknowledged challenges to accessing quality jobs data and committed to procuring this data as part of its certification application process. The Legislature recently responded and emphasized the importance of making strong efforts to acquire reliable jobs data to report to the public and to state decisionmakers.

The initial certification application is the best touch point to collect information regarding facility employment records. The Department receives applications from across the Western Electricity Coordinating Council, and each certification will last three years. Procuring information as early as possible is especially important as employment values associated with design and installation are more easily available closer to project construction.

### **Section VI: Additional Supplemental Applications**

For solar, wave, wind, and geothermal facilities, the application process is straightforward, and only a General Application is required. Biomass, hydropower, and other facilities have more complicated eligibility considerations that require more information. Rather than make a different application for all renewable power projects, the Department created a single General Application that applies to all facilities, and supplementary applications for unique circumstances. Currently, three supplements are the

most that could possibly be required by any one facility (e.g. a multi-fuel natural gas/biomass capacity upgrade).

### **Section VII: Application Checklist for Submission**

Finally, the Department provides a checklist to help an Applicant submit a complete application. We ask for a character-readable PDF copy to be submitted along with the signature page. Supplementary applications may be required to complete the submission.

On top of these forms, we ask for two additional items. One is the WREGIS “static data.” Static data is essentially a printout of the WREGIS generator account profile as it appears online. Program administrators do not have rights to generator accounts in WREGIS and cannot review the data that the Applicant has already provided to WREGIS.

The last item on the checklist is a request for descriptive information about the facility that is published or has been submitted to a regulatory agency. Examples of acceptable forms of project information are listed on the checklist. The Department appreciates additional photos and diverse sources of information about the facility.

### **Section VIII: Reservation**

This section provides a clear reservation for future Department actions once the application is submitted. As a state agency, the Department is subject to audits. We may also commission third-party review for program development.

### **Section IX: Attestation**

The Department requires a signature attesting to the information submitted in the application. This attestation extends to all applications provided in the submission. The attestation is intended to ensure that the Applicant has exercised due diligence in making the application. This requirement is a standard feature on Department application forms.