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Contract 11-114: Oregon Department of Energy / Center for Resource Solutions

Summary of Issue

The Western Renewable Energy Generation Information System (WREGIS) allows generation that occurred as many as 75 days prior to facility registration to be reported and to receive WREGIS Certificates. Certain facilities that are eligible for the Oregon renewable portfolio standard (RPS) requested that generation occurring prior to this cutoff be recorded in WREGIS, and that renewable energy certificates (RECs) be issued in WREGIS retroactively for this stranded generation. If RECs from this earlier generation have already been sold to voluntary market participants or used for a state's RPS, double counting could occur if the newly issued RECs are transferred to a party other than the rightful REC owner and claimant.

Center for Resource Solutions (CRS), which administers the Green-e programs, has been contracted to check the data submitted to it by Green-e Energy participants and report on any generation for which retroactive REC issuance would potentially cause double counting with Green-e Energy certified sales.

Methodology

The Oregon Department of Energy (ODOE) provided CRS with data on the facilities and MWh for which retroactive REC issuance was requested. CRS compared this data to Green-e Energy verification data for which the generation periods overlapped. The first round of review noted facilities appearing in both datasets for a particular quarter of generation and whether the amounts of MWh were sold in Green-e Energy certified retail sales or wholesale transactions. The second round of review looked specifically at Green-e Energy certified wholesale transactions involving the MWh in question, tracing the chains of custody back as far as possible in order to determine whether double counting was a risk.

In cases where the total generation from a facility was greater than the sum of MWh sold in Green-e Energy certified sales plus the amount requested for retroactive REC issuance, CRS investigated the reasons for such discrepancies. The results of such investigations are provided in the Findings section of this report.

The follow facilities were identified in the first round of review as having generation from a given quarter and year showing up in both Green-e Energy records and in ODOE's stranded generation data.

Facility Name	Quarter and Year of Generation	Facility appears in Green-e Energy Sales Year
Condon Wind	Q1 2008	2008
Condon Wind	Q2 2008	2008
Foote Creek I	Q3-Q4 2007; July-Oct 2007	2008
Glenrock III	Q1 2009	2009
Klondike II	Q1-Q2 2007	2008
Klondike III	Q4 2007	2008
Klondike Wind Project: 2	Q1-Q2 2007	2007
Leaning Juniper I	Q3 2007	2008
Leaning Juniper I	Q3-Q4 2007	2008
Marengo	Q3 2007	2008
Marengo	Q3-Q4 2007	2008
Mountain View I	Q4 2007	2008
Mountain View II	Q3 2007	2008
Mountain View II	Q4 2007	2008
Mountain Wind Power I	Q4 2008	2008
Mountain Wind Power I	Q4 2008	2009
Mountain Wind Power II	Q3 2008	2009
Mountain Wind Power II	Q4 2008	2008
Mountain Wind Power II	Q4 2008	2009
Stateline	Q1 2008	2008
Stateline	Q2 2008	2008
Stateline	Q3 2007	2008
Stateline	Q4 2007	2008

Findings

Based on the second round of review, CRS identified a small subset of the above of facilities that warranted further research.

Klondike III: Initially the total certified sales plus ODoE's figures appeared to exceed generation from the second half of 2007. Upon investigation, ODoE data lists this facility as having an online date of November, 2007, while Green-e Energy sales contain some energy from the facility that it put onto the grid before its official commercial online date. Based on this finding, we found no evidence of double counting occurring for that period.

Mountain View I: The total generation number as reported by ODoE appears to be incorrect. We have received an attestation from the facility to a program Participant for more MWh of Q4 2007 generation

than is listed on ODoE's stranded generation spreadsheets. If this higher total is correct, then we see no evidence of double counting. In the case that ODoE wants to request this attestation from the generator for confirmation, basic details are provided below.

Attestation details:

- Date Signed – [REDACTED]
- Sales Year Claimed – [REDACTED]
- MWh on Attestation – [REDACTED]

Mountain View II: Similar to Mountain View I, ODoE's total generation number may be off for Q3 2007. In order to confirm, ODoE could request the attestation below from the generator.

Attestation details:

- Date Signed – [REDACTED]
- Sales Year Claimed – [REDACTED]
- MWh on Attestation – [REDACTED]

Mountain Wind Power I: We initially found that the total MWh of generation from this facility in Q4 2008 was insufficient to cover both Green-e Energy certified sales and the amount of MWh seeking retroactive REC issuance. We approached a Greene Energy participant and ODoE about their data sources and found that due to differing data aggregation methods our initial finding was incorrect. This is due to stranded generation RECs being requested for October and November, 2008, generation, but Green-e Energy summary data covering the full quarter. Therefore, no double counting was ultimately identified, and only on looking back to month-by-month data was this apparent.

Stateline: The generation from these facilities on the Washington/Oregon border was reported to Green-e Energy in combined attestations for sale made in 2008. CRS requested and received further generation data from ODOE for both facilities in Q2 2008 to check against Green-e data and found no instances of double counting. CRS found that one Participant had mistakenly indicated an incorrect quarter on one of the attestations, and that Participant has issued a revised attestation.

Conclusion

CRS identified very few instances of potential double counting. CRS has provided information for ODoE to follow up on these instances. Since RECs have already been issued for stranded generation, our recommendation is that any newly issued RECs that had already been sold to voluntary market customers in certified sales prior to issuance should be transferred to the original REC purchaser. CRS would be happy to help assist in this.