



November 10, 2003

California Energy Commission
Re: Docket No. 03-RPS-1078
Docket Unit, MS-4
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To Whom It May Concern:

The following represents PPM Energy's comments regarding the Needs Assessment for a Western Renewable Energy Generation Information System Draft Report, Docket number 500-03-098D

PPM would like to make the following comments on selected questions on the stakeholder comments located on page 12 of the report:

Summarized Request for Comments

Comments on any part of this document or any of the recommendations or survey findings are welcome. We are particularly interested in stakeholder comments on the following questions:

- 1. Should WREGIS be designed to facilitate imports and exports? Please be clear whether you mean imports and exports between states that are part of WREGIS, or between WREGIS and other tracking systems. Proponents should indicate the type of information you believe is necessary to perform either function.*

WREGIS is about promoting a regional authority for what constitutes a REC. Imports and exports between states are therefore one of the most helpful functions that the WREGIS tracking system could perform. Whether any particular state program permits imports is up to that program, but WREGIS should seek to enable imports and exports. Imports and exports are important because:

- Interstate competition will create more competition therefore lowering the price of RECs for all renewable customers;
- A robust, liquid interstate tag market will establish a predictable value for RECs and allow developers and utilities to assign value to their renewable investments;
- Standardizing tags across regions through programs that allow imports and exports and rely on WREGIS will avoid balkanizing renewable resource markets.
- Questions about violation of the U.S. Constitution's interstate commerce clause will be eliminated; and
- With an effective, reliable import/export infrastructure provided through the WREGIS system, utilities, states and regions will be able to determine for themselves how much or little participation exports will play in their renewable markets.

4. *Should generator information that is voluntarily provided undergo the same level of verification as other information in the database? Or would it be acceptable if WREGIS tracked information that was voluntarily provided (see list on page 7), but made no claims as to the accuracy of the information?*

Generation verification is important, however, the verification process should be as simple and non-intrusive to all parties as possible. Information that is voluntarily provided should not be treated in a manner that makes it inherently less reliable - through avoidance of an appropriate verification or otherwise, than other information in the WREGIS system.

8. *Should WREGIS accept emissions “offset” data, as distinct from emissions data, and if so, under what circumstances? Would it be acceptable if this information is voluntarily provided and thus tracked by WREGIS but not verified or substantiated by WREGIS?*

Emission offset data may an important part of the REC market. However, there are many complicating factors that would go into creating reliable verification data, therefore this is project that WREGIS should take on with interested parties after the initial system is up and running.

9. *Do you have any specific comments on the recommendation related to disaggregation of RECs in the WREGIS (page 9)?*

Disaggregation may also be an important part of the REC market. However, this too adds a number of complicating and potentially controversial factors that would best be tackled by interested parties after the system is in place. While the program is in its infancy, it is important that we focus on setting up a system that can track RECs in a comprehensive fashion, using a robust, all-inclusive definition of RECs. This will maximize the fungibility of WREGIS RECs among the many voluntary and mandatory RPS and other programs for the use of renewable energy for which we wish to promote the use of WREGIS-tracked RECs. We can address the particular desires of stakeholders, or of later-enacted programs, with respect to stripping out components of a REC, later as a consensus emerges on this issue.

11. *What date/time stamp should be given to RECs that are issued by WREGIS? Proponents of tracking generation more frequently than “daily” and of a “peak/off-peak” designation should provide additional explanation of their rationale.*

At this time, the time stamp should not be any more frequent than monthly. Anything more frequent would impose a considerable operational burden on those generators and collectors of this data.

12. *Do you have any opinions on what organization or agency should administer the WREGIS?*

An independent organization with its own board and established rules is important. Technical administration could be delegated to a vendor after a competitive bidding process.

Respectfully Submitted,



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