## WREGIS Retirement Account Subaccount Naming Convention Reporting Guidance

The updates to <u>The Enforcement Procedures for the Renewables Portfolio Standard for the Local Publicly Owned Electric Utilities</u> (RPS POU Regulations), available at https://www.energy.ca.gov/media/6111, were adopted by the California Energy Commission (CEC) in December 2020 and became effective July 12, 2021. Section 3207 (c)(2)(D) of the RPS POU Regulations requires POUs to provide a preliminary, nonbinding classification of retired electricity products qualifying for each portfolio content category (PCC). In addition to the PCC classifications, POUs shall also classify retired electricity products as long-term or short-term, beginning in Compliance Period 4, pursuant to section 3207 (c)(2)(E).

When retiring and reporting information in the Western Renewable Electricity Generation Information System (WREGIS), the CEC requires that load-serving entities (LSE) use the standardized retirement subaccount naming conventions detailed in Chapter 7, Section A.1. of the RPS Eligibility Guidebook. However, because the Guidebook has not yet been updated to incorporate the recent change in the RPS POU Regulations, this guidance document is necessary to provide standardized retirement subaccount naming conventions with details on long- and short-term classification.

Note: The subaccount naming conventions are unchanged for retail sellers.

Subaccount naming will vary for different types of LSEs:

## A. Retail Sellers

Retail sellers continue to retire all claims into one retirement subaccount designated for retail sellers for each reporting year. The CEC recommends that this subaccount be named using the following format:

[Reporting Year (YYYY)] CA RPS RTSL

For example, the required subaccount name for RECs retired and reported by a retail seller for 2021 is: 2021 CA RPS RTSL

## B. POUs Interconnected to a CBA

To facilitate an efficient verification of RECs retired in WREGIS, POUs that do not meet the requirements of Public Utilities Code Sections 399.18 or 399.30 (h) should, based on REC type, retire into one of the following seven retirement subaccounts for each reporting year. These seven retirement subaccounts are used to preliminarily classify RECs into the PCC and Long-Term Procurement Requirement (LTR) classifications. Failure to retire into the appropriate WREGIS

subaccount or failure to follow this guidance for subaccount naming will lead to delays in the verification of claims.

Table 1 specifies the possible PCC codes for each retirement subaccount. Table 2 specifies the possible LTR codes for each retirement subaccount. Table 3 includes all seven possible combinations of PCC and LTR conventions within retirement subaccount naming.

Table 1: PCC Codes for POUs in CBAs

Portfolio Content Category (PCC)	Code
Count in Full RECs	PCC0
Portfolio Content Category 1 RECs	PCC1
Portfolio Content Category 2 RECs	PCC2
Portfolio Content Category 3 RECs	PCC3

Table 2: LTR Codes for POUs

Long-Term Procurement Classification	Code
Long-term	LT
Short-term	ST

Table 3: PCC and LTR Code Conventions for POUs interconnected to CBAs

PCC0 LT	PCC1 LT	PCC2 LT	PCC3 LT
	PCC1 ST	PCC2 ST	PCC3 ST

PCC0 RECs should be classified as long-term (LT) only, pursuant to RPS POU Regulations section 3204 (d)(2)(J). When amendments to PCC0 contracts result in a change to the PCC classification of RECs procured under the contract, as specified in section 3202 (a)(2)(B), the RECs must then be classified into the appropriate PCC and LTR status.

The CEC recommends POUs Interconnected to a CBA to use the following format to name WREGIS subaccounts:

[Reporting Year (YYYY)] CA RPS [PCC code] [LTR code]

For example, the recommended subaccount name for PCC 1 RECs from a qualifying long-term contract retired and reported for 2021 is: 2021 CA RPS PCC1 LT

## C. POUs Not Interconnected to a CBA

POUs that meet the requirements of Public Utilities Code Sections 399.18 or 399.30 (h) shall retire RECs into one of the following five retirement subaccounts for each reporting year. These five retirement subaccounts are used to preliminarily classify RECs for verification.

Table 4 specifies the possible subaccount codes for each retirement subaccount. Table 5 specifies the possible LTR codes for each retirement subaccount. Table 6 specifies the five possible combinations of subaccount type and LTR conventions within retirement subaccount naming.

Table 4: Subaccount Codes for POUs Outside CBAs

Subaccount Type	Code
Count in Full RECs	PCC0
Bundled RECs	BNDL
Unbundled RECs	TREC

Table 5: LTR Codes for POUs

Long-Term Procurement Classification	Code
Long-term	LT
Short-term	ST

Table 6: Subaccount and LTR Conventions for POUs Outside CBAs

PCC0 LT	BNDL LT	TREC LT
	BNDL ST	TREC ST

The CEC recommends using the following format to name the subaccounts:

[Reporting Year (YYYY)] CA RPS [Subaccount code] [LTR code]

For example, the recommended subaccount format for bundled RECs from a qualifying long-term contract retired and reported for 2021 is: 2021 CA RPS BNDL LT