

## **Washington State's Energy Independence Act Docket UE-110523**

### **Compliance Reporting Tool Summary**

#### **Renewable Target Energy Reporting Guidelines to the Washington Utilities and Transportation Commission**

##### **Purpose**

Capture informal Stakeholder<sup>1</sup> consensus with respect to implementation of Washington State's Energy Independence Act ("EIA") renewable energy target reporting related to docket UE-110523 for requirements pursuant to RCW 19.285.070(1) and WAC 480-109-040(1).

##### **Reporting [RCW 19.285.070]**

Stakeholders have informally agreed to use the following approach to reporting by utilities:

- File a report on progress in meeting renewable resource targets on or before June 1, 2012, and annually thereafter, describing the resources acquired by January 1 of the target year intended to meet the renewable energy target;
- Use reporting outline [See Attachment A];
- Use a Compliance Reporting Spreadsheet (also referred to as "Spreadsheet") [See Attachment B] that includes information on the compliance year, the preceding year and the subsequent year, as applicable;  
(Utilities may unilaterally make modifications to the reporting outline and Spreadsheet based on individual utility needs, as appropriate); and
- Utilities may need to protect commercially sensitive information by use of the "Confidential" designation in any or all of the tools used for reporting requirements.

##### **Reporting Requirements [WAC 480-109-040 (1)]**

Stakeholders have informally agreed to include the following information in the Spreadsheet, as applicable:

- Eligible renewable generation, renewable energy credits, and load.
  - The utility's annual Washington load for the prior two years;
  - Amount of megawatt-hours needed to meet the annual renewable energy target by January 1 of the target year;
  - The report must describe the steps the utility is taking to meet the renewable resource requirements for the current year.
  - Amount of megawatt-hours of each type of eligible renewable resource acquired, and/or renewable energy credits acquired and multiplier credits, if any; and
  - Amount (in megawatt-hours) of eligible renewable resources<sup>2</sup> or renewable energy credits applied to the renewable energy target from the prior year, target year or subsequent year

---

<sup>1</sup> Stakeholders include Commission Staff, utilities and other participating parties in the Commission Staff hosted RPS Workshop in Docket UE-110523

- For multi-jurisdictional utilities, report Washington allocated eligible renewable resource or renewable energy credits applied to the renewable energy targets from the prior year, target year or subsequent year.

### Report Supporting Documentation

Stakeholders have informally agreed to include documentation to support data provided in the Spreadsheet, as further described below. Some commercially sensitive data may be designated as “Confidential”.

- Utilities may provide any of the following documentation to demonstrate acquisition by January 1 of the target year for megawatt-hours contracted for or generated from eligible renewable resources, and/or renewable energy credits, and other multiplier credits [**RCW 19.285.030, RCW 19.285.070**]:
  - Utility-Owned Generation
    - WREGIS report of certificates from utility-owned generation; or
    - Attestation(s) signed by the utility reporting the amount of generation from non-WREGIS facilities for a specified time period, and confirming no double-counting (only for facilities for which WREGIS tracking is not reasonably available)
  - Purchased Generation and/or Purchased Renewable Energy Credits
    - WREGIS report of certificates from purchased generation and/or renewable energy credits; or
    - Attestations from seller reporting the amount of generation purchased from a non-WREGIS facility and/or renewable energy credits for a specified time period, and confirming no double-counting (only for facilities for which WREGIS tracking is not reasonably available)
  - Incremental Hydro [**RCW 19.285.030 (10) (b)**]
    - Provide documentation as recommended by Incremental Hydro Electricity Calculation Methodologies outline [See Attachment C]
  - Multiplier Credits
    - Apprenticeship Labor Credits [**RCW 19.285.040 (2) (h) (i)**]
      - Utilities agree to provide a letter from Washington State Apprenticeship and Training Council (Washington State Department of Labor) certifying that the renewable energy project met the apprentice labor standard [**WAC 296-05-329**]
    - Distributed Generation Credits [**RCW, 19.285.040 (2) (b)**]
      - Utilities agree to provide sufficient documentation that
        - the generation facility or any integrated cluster of such facilities has a generating capacity of not more than five megawatts. [**RCW.19.285.030 (9)**]
        - the associated renewable energy credits are not owned by a separate entity [**RCW.19.285.040 (2) (f) (i)**]

---

<sup>2</sup> Eligible renewable resources are only allowed to be applied to the target year in which the power was generated.

### **Timing of WREGIS Certificate Retirement and WREGIS Reports to the Commission**

- WREGIS certificates associated with the reported eligible renewable resource or renewable energy credits to be used for compliance in the target year, will be placed in an active WREGIS sub-account (designated for Washington compliance for the specific target year) – including any applicable WREGIS certificates created in the prior year and being used for compliance in the specific target year. WREGIS certificates will be retired in the sub-account as directed by the Commission.
- Given target year compliance can be achieved from renewable energy credits produced during the target year, the preceding year or the subsequent year, there could be notable lag associated with the creation of WREGIS certificates, and in addition, retirement of WREGIS certificates. The utility will provide Commission staff with a WREGIS report that demonstrates WREGIS certificates were retired for a specific target year (after-the-fact). Some commercially sensitive data provided to Commission staff may be designated as “Confidential”.