Backloading Discussion with Subscriber Group

Goal for today:

Capture Subscriber input to inform backloading processes and concepts in Operating Procedures policy recommendation to MRETS Board.

Summary:

Backloading refers to extending the adjustment reporting period and the issuance of retroactive certificates. Automatic creation of retroactive Certificates is not part of the standard functionality of M-RETS.

M-RETS processes about one backloading variance request per month. These variances must be approved by the board. The frequency of the variance requests have led us to considering adopting an official backloading policy in the Operating Procedures, so that fewer variances are reviewed. We hope to have a draft policy for the board to review in November. Also, with the anticipated increase of more DG units we expect to be registered in the system, backloading of generation 365 days prior to registration has been a common request. M-RETS is reviewing and plans to update backloading policies and procedures to reflect current practice and system needs based on requests.

Questions to Subscribers:

Subscribers identify key drivers for the need for backloading and legitimate scenarios that would prevent an account holder from registering their project on time. What are some likely instances that would delay registration of a generator?

Discuss ways to avoid risks to the value of RECs and need to maintain validity of system. Subscribers identify risks and worst case scenarios when allowing retroactive REC issuance.

Pertinent Sections of Operating Procedure:

i.	7.3	Measurement of Generation and Adjustments
ii.	7.4	Prior Period Adjustments
iii.	7.4.1	PROPOSED NEW SECTION ON BACKLOADING AND RETROACTIVE REC'S
iv.	7.8	Special Requirements for Self-Reporting Generators Only
v.	7.6	Frequency of Data Collection/Meter Reading
vi.	10.3	Process and Timeline for M-RETS Certificate Creation
vii.	10.4	Certificate Creation for Accumulated Generation

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Matrix of Types of Backloading Requests and Proposed Criteria:

	All Backloading Request that do not meet Pre-Approval Criteria	All Backloading Request Criteria for Pre-Approval	Backloading as it pertains to DG at time of registrations
Allowable Backloading Timeframe	Requests have come in to backload from 2007. No requests for backloading to date prior to existence of the M-RETS System.	Requests have come in to backload from 2007. No requests for backloading to date prior to existence of the M-RETS System.	**Proposed Language**: Upon acceptance of the facility's registration, the Self-Reporting generator may report up to 365 days of previous generation.
Technological/ Administrative Considerations	N/A	Backloading requests that fall outside the defined subset of generators are subject to review and data request to facilitate the request. Backloading requests that fall outside the defined subset of generators may still require a system modification to fulfill the request.	Currently, the M-RETS program doesn't easily allow for backloading. Every backloading variance requires a modification to the M-RETS system. Developers have to go through testing to make sure the system is working correctly due to the modification outside of the registry design implementing variances require development and administrative time to implement . If a backloading policy is approved for a subset of generators (DG under 15kW) M-RETS will need to implement code that reflects the M-RETS policy. We have no development estimate at this time.
Driver	Approximately 1 significant backloading request every 2 months.	Approximately 1 significant backloading request every 2 months.	We are anticipating increased numbers of DG registrations. This may require some system development depending on volume of requests. A frequent request and expectation of DG account holders is that their prior year of generation will be loaded into the system, particularly some units in MN installed after 5/24/13.

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	All Backloading Request that do not meet Pre-Approval Criteria	All Backloading Request Criteria for Pre-Approval	Backloading as it pertains to DG at time of registrations
Distinguishing Criteria	Examples of Non-Legitimate Criteria that have been previously approved. 1. Administrative Error 2. Oversight 3. Staff Changes 4. Human Error 5. Unfamiliarity with Requirements	Examples of Legitimate Criteria that have been previously approved. 1. PPA contract clarity-silent on RECs 2. Waiting on regulatory order 3. Determining Program Eligibility	Nameplate capacity of less than or equal to 150 kW or generators using Distributed Generation Aggregation may opt to be treated as a Self-Reporting Generator

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Matrix of Other Tracking System Procedures:

*Note that the M-RETS board includes regulators from throughout the M-RETS footprint, in contrast to the other tracking systems.

	WREGIS	PJM EIS
Existing Policy in Operating Procedures	Yes, 12.9 of the WREGIS OP page 39	6.3.3-Non PJM Generators and 6.3.7 Third Party Generators "Generation can be entered retroactively for any month in the reporting year based on the rules of the state the facility is certified in"
Time Limit	No time limit	
Source of request	Only receive requests from state or provincial programs	
Types of Requests	Compliance only	Upload capability for solar systems- Generation can be entered retroactively for any month in the reporting year.
Charge for Services	Requester must pay for the cost of the labor for manually entering data and verification and any system changes requiring a CR	