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Background

Introduction

This document is an instructional guide for organizations looking to use the M-RETS® Renewable Thermal Tracking System (RTC) for compliance with the Washington Clean Fuel Standard (CFS). M-RETS supports a variety of renewable thermal technologies including: renewably produced hydrogen, ground source heat pumps, renewable natural gas, sewer/wastewater heat recovery, etc. For a full list of the currently approved resource types and feed stocks refer to Appendix B of the M-RETS Renewable Thermal Operating procedures. M-RETS will support state utility commissions and other state energy regulators to implement policies and rules, including what qualifies as an eligible generation technology.

The Washington CFS requires the use of this tracking system just for renewable natural gas that has been injected into pipelines and then booked and claimed as being used in Washington. Renewable Natural Gas producers must register with and receive approval for their fuel pathways prior to it being reported in the CFS. More information on the Clean Fuel Standard can be found on its website. Questions specific to the program should be directed to Washington Department of Ecology Staff at cfs@ecy.wa.gov.

The following sections will help users register an Organization account subscription with M-RETS, register an RTC Generator, report generation, and manage their RTCs. The M-RETS® Administrator is available to assist you throughout the registration process. Please call 651-900-7891, or email at systemadmin@mrets.org

Register An Organization

The following section will guide you through the steps necessary to create an M-RETS® RTC Organization account.

Step 1: Review Registry Documents

Registry Documents

- M-RETS® Renewable Thermal Operating Procedures
- MRETS Terms of Use

Step 2: Complete the Online Registration

You can register a new organization in our Web Portal.

1a) Select the ‘Renewable Thermal’ button to begin the RTC Organization Account Registration.
1b) Complete the Organization Type and User information

1c) Select the Account Type. For more information about the M-RETS Organization Subscriptions, and fees, refer to our website. To register an account for the purpose of complying with the Washington CFS, a General Account Subscription is required.
1d) Complete your organization’s contact information.

<table>
<thead>
<tr>
<th>Select the M-rets account type you would like to setup:</th>
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<tr>
<td>Generator Account</td>
<td>No Fee</td>
</tr>
<tr>
<td>General Account</td>
<td>$2200 per year</td>
</tr>
<tr>
<td>Independent Reporting Entity</td>
<td>No Fee</td>
</tr>
<tr>
<td>Program Administrator</td>
<td>No Fee</td>
</tr>
<tr>
<td>Market Administrator</td>
<td>No Fee</td>
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<td>No Fee</td>
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</table>

Register your Organization

Please provide contact information for your organization:

- **Contact Name**: 
- **Title or Role**: 
- **Organization Name**: 
- **Address**: 
- **City**: 
- **Country**: 

1e) Complete the Billing Contact Information.

1f) Confirm the registration information is correct.
Register your Organization

Already have an account? Sign in | Organization already registered? Contact System Administrator

[Progress bar]

Registrant & Organization Information:
- Name: Bryan Gower
- Email: bryan@mrets.org
- Organization: M-RETS RTC
- Organization Type: Renewable Thermal Generator or Marketer
- Subscription Level: General Account
- Subscription Fee: $2,200

Contact Information:
- Name: Bryan Gower
- Job Title: Manager
- Phone: 9258099999
- Address: 123 Any Street
- Postal Code: 98000
- City: Any Town
- State: FL
- Country: United States
- Website:

Billing Contact Information:
- Name: Bryan Gower
- Phone: 9258099999
- Email: bryan@test.com
- Address: 123 Any Street
- Postal Code: 98000
- City: Any Town
- State: FL
- Country: United States
- PO Number:

I acknowledge that submitting this registration form will result in the establishment of an official registered subscription in M-RETS. I agree to pay the above registration fee within 30 days of receiving the invoice. If not paid in this time, I understand my subscription will be cancelled.

[Buttons: Back, Submit]
1g) Submit the registration. The M-RETS Administrator will review the registration and contact you if there is additional information needed. Once the application has been approved, you will receive an email confirmation.

Step 3: Create Account(s) & Additional Logins
After the Organization account approval, the M-RETS Administrator will send the designated Organization Admin an invite to log into the system. Additional users and RTC accounts can then be created from inside the organization.
Register an RTC Generator

**PLEASE NOTE** We are expecting to add the functionality to add WA CFS eligibility by Q4 2023, until this time users will be unable to add the WA CFS eligibility to their generators. Please register your generator, however, M-RETS will not approve any registrations until we release the eligibility functionality.

Each RTC Generator will need to be registered. To begin the registration:

1. Log into your RTC Organization Dashboard.
2. Select the Generators button in the lefthand menu to navigate to the Generators Dashboard.
3. Select the “Add New Generator” button.

Complete the Generator Registration. There are seven registration tabs to complete:

- **General:** General information about the Generator including Location and Reporting Entity. RTC Generators reporting CI scores are required to use a Reporting Entity. The Third-Party Engineer used to prepare the CI Reporting can also report the generation injections for the Generator. M-RETS currently has two verified Independent Reporting Entities (IRE). Contact the M-RETS Administrator if you would like your Third-Party Engineer to register as an Independent Reporting Entity. RTC Generators are charged a one-time registration fee of $1500, however; Generators that register and use an IRE for the full first year of generation may have this fee waived if the IRE verifies through a signed legal attestation that the information submitted through the registration process is true and correct.
- **Owner:** General ownership information including Ownership Type and Contact information. If the RTC Generator is registered by a designated responsible party on behalf of an owner, the owner will need to sign our [Schedule A: Designation of Responsible Party RTC](#).
- **Operator:** Contact Information for the Facility Operator and Licensed Engineer.
- **Engineering:** Injection Type, Metering Information, and engineering details such as Commenced Operation Date and Plant Capacity (monthly and annual).
- **Fuel(s):** Designation of Thermal Resource, Feedstock(s), and Program Eligibilities. Participants of the Washington CFS should designate the “Washington CFS” Program Eligibility from the Program Eligibility Dropdown located in the Fuel(s) tab of the Generator Registration.
Fuel Portal (AFP) Pathway Code should be reported in the field provided. If you only have approval for a temporary fuel pathway code when you register, use the temporary fuel pathway code. When the temporary fuel pathway code is replaced with a provisional or full fuel pathway code, the M-RETS user must notify the M-RETS Administrator.

- If your facility has multiple fuel pathways, for registration purposes, use the fuel pathway code that the majority of the RNG you will produce is created from. For retiring RTCs, the fuel pathway name and specific fuel pathway code will be used for each unique fuel pathway.

- **Fuel Pathway:** Add the documentation that supports the final CFS CI score, the WA-GREET, tier 1, or tier 2, or modified WA-GREET methodology used to estimate the CI score for the fuel pathways, documentation for temporary fuel pathways, as well as the documentation prepared by the Third-Party Engineer.

- **Documentation:** Documents supporting the RTC Registration including:
  - **Schedule A: Designation of Responsible Party RTC**
  - Engineering Report prepared by a licensed Professional Engineer
    - A detailed description of the system and its components
    - Documentation for measuring and verifying the quantities of each feedstock
    - Fuel/feedstock sources
      - Fuel processing
      - Description of Interconnection/Injection point and measurement
      - Pipeline details
      - End user
    - Process flow diagram
    - (Third party PE Required) Initial review of fuel pathways/carbon intensity score
    - Analysis of the Carbon Intensity and assessment methodology
    - Review all inputs and outputs that could affect CI
    - PE stamp and credentials

- Any additional documentation requested by M-RETS to verify the registration information:
  - It is helpful for generators to include a generator interconnection agreement if the generator is connected to a natural gas pipeline or a natural gas distribution network.
  - Any local, state, or provincial documentation or permits that can substantiate the generator registration data.

- Required Documents:
Before generation can be uploaded the M-RETS Administrator must review and approve the generator.

**Reporting RTC Generation**

The Renewable Thermal System (RTC) system requires Independent Reporting Entities (IRE) to report generation in Dekatherms (Dth) and submit proof of injection/generation. *Note: the IRE must upload 100% of their generation even if the total percentage is not allocated for RTC creation.*

The IRE should log into their RTC Dashboard and select "Generation" from the left menu.

Select "Add New Entry" in the upper right-hand corner.
Step 1: Select Generator and Report Generation

The IRE will select the Generator to upload generation. The IRE must fill out the reporting Period, Total Injected DTH and declare if the generation is 100% renewable. Once you have filled out the corresponding fields select ‘Next.

Step 2: Fuel Allocation and Qualified Issuance

Generators must report 100% of the gas injected into the system from the Generator at the injection point, even if the gas will not be tracked in M-RETS. This ensures that M-RETS can serve as a central repository for programs, including those not affiliated with M-RETS, to prevent double-counting. M-RETS will not create certificates for the generation entered and designated as not being tracked in M-RETS. To designate the number of certificates or the percentage of the injected gas sought for certificate issuance in M-RETS, the IRE will select the: “Edit Qualified Issuance” button from the Allocation screen to designate the quantity of reported generation that is qualified for RTC issuance. If a portion of generation was sold into another program (e.g., California’s LCFS) those portions are not Qualified for issuance.

RTC Qualified Issuance Options:

- **Qualified Generation**: any generation that qualifies for certificate issuance.
- **Non-Qualified Generation**: generation that does not qualify for certificate issuance.
  - Includes generation intended for a program that does not recognize M-RETS or is not considered renewable (e.g., non-renewable additives)
- **Partially Qualified Generation**: generation that only partially qualifies for certificate issuance.
**Qualified Issuance Options**

**All Qualified for RTC creation**

100% of the reported generation is eligible for RTC creation.

**Partially Qualified for RTC Creation**

Only the percentage reported is eligible for RTC creation.
Not Qualified for RTC Creation
None of the reported generation is eligible for RTC Creation (e.g., 100% of the reported generation for the designated period was sold into another program).

Allocate the percentage of each feedstock made up of the total reported generation. The feedstock allocation must total 100%. The Allocation screen will calculate the reported percentage and will designate that the total correctly calculates 100% by turning green in the footer.

Step 3: Documentation
Upload the supporting documentation for the injected generation (e.g., invoice, injection receipt, or other official documents that identify the Dth of gas injected).

Step 4: Review
Review the reported Generation and select “Save” and “Submit”. The RTCs will be issued into the account.
Once M-RETS RTCs are issued, the certificates can be managed from the Certificates Dashboard. The Certificates Dashboard is where the user can manage all Active, Retired, and Reserved certificates in their Organization’s accounts.

RTC Management

By clicking Submit, I acknowledge that I have reported 100% of the selected Generator’s injection into the pipeline.
From the Certificates Dashboard, you can view certificates based on their status in the tabs located at the top of the table: Active, Retired and Reserved. Each status has an associated account where RTCs can be deposited. The User can set up as many Active, Retirement and Reserve accounts as they need.

**Active:** RTCs deposited into Active accounts. The Active Account is the holding place for all active Certificates. An Active Account may be associated with one or more Generators.

**Retired:** RTCs deposited into Retirement accounts. A Retirement Account is used as a repository for Certificates that the Organization wants to designate as retired and remove from circulation for an environmental claim, in compliance with a state or provincial program or on behalf of a beneficial owner. Once an RTC has been transferred into a Retirement Account, it cannot be transferred again to any other Account.

**Reserve:** RTCs deposited into a Reserve Account. Transferring Certificates to a Reserve Account removes the Certificates from circulation for external use. Once Certificates are placed in a Reserve Account they can no longer be transferred to another organization. Reserve Accounts and the transactions associated with them are considered permanent. Certificates deposited into a Reserve Account will be settled and claimed outside of M-RETS. The M-RETS Administrator cannot verify an environmental claim for certificates deposited into the Reserve Accounts.

Creating Active, Retirement and Reserve Accounts

From the dashboard, navigate to ‘Accounts’. Next, select "Add New Account".
From the "New Account" screen, use the Account Type dropdown to choose an ‘Account Type’ to create. Name the account, once you have entered the necessary information select “Save”.

The User can now deposit RTCs into this account.

Configuring a Retirement Account with the Washington Program

**PLEASE NOTE** We are expecting to add the functionality by Q4 of 2023, until this time the WA ECY will be unable to create a program and invite participants to the program.
The Washington ECY will set up a Program for the RTCs to be retired into. You will be invited to participate in the Washington Clean Fuel Standard by the WA Program Administrator. ECY requests that you notify them via email at CFS@ecy.wa.gov with the subject line “M-RETS Account” in the subject line when you receive your M-RETS account. After the ECY Program Administrator invites the program participant to the program, the participant will create a Retirement Account and link it to the Washington ECY CFS Program.

When you are invited to participate in the Washington Clean Fuel Standard, you will receive an email and you will see a message displayed on your dashboard:

To participate in a Program, you must first create a new retirement account. Select ‘Accounts’ from the left menu.

Select " Add New Account". 
Change the account type to "Retirement" and select Washington Clean Fuel Standard as the program on the right.
**Name the Account** (e.g., **Account Type**: Retirement; **Account Name**: Washington CFS Q1 2023 [Fuel Pathway Code]) once you have completed all fields, select “Save”.

RTCs deposited into this Account will be monitored by the Washington ECY for compliance with the Washington Clean Fuel Standard.

Transfer certificates into a Retirement account for the WA Clean Fuel Standard. Navigate to the Certificates dashboard from the left menu and select the certificates that you wish to retire from the Active tab.
Once you have the designated certificates to retire, select “Retire” in the upper right corner.

Select the quantities that you wish to retire. Designate the Carbon Pathway from the dropdown if applicable. The details button will allow you to review the RTC batch details and Carbon Pathway.
Once you have reviewed the quantities and details, the next screen will ask you for the Retirement Reason. You will be asked to select either Voluntary or Compliance. **The Washington Clean Fuel Standard is a Compliance Program.** Each field requires several fields of information to be filled out. See below for a breakdown of the required fields. **Note: the Compliance type you should use for the Washington CFS program is Low Carbon Fuel Standard.**
Compliance Retirements:

- Compliance

Type

- Select a retirement type
  - LCFS/RFS Stacked Claim
  - State/Provincial Portfolio Standards
  - Other - Non-RPS Compliance
  - Low Carbon Fuel Standard
  - Renewable Fuel Standard

- LCFS/ RFS Stacked Claim
  - This should be selected only if the Certificates subject to this claim will be used for the United States Environmental Protection Agency Renewable Fuel Standard and the Low Carbon Fuel Standard. Use of this retirement type is subject to official rules and regulations of the Renewable Fuel Standard. It is most often the case that Both will be selected as these attributes are frequently stacked.

- State/ Provincial Portfolio Standards
  - State-Regulated Utility Renewable Portfolio Standard/Provincial Utility Portfolio Standard (RPS) retirements

- Other - Non - RPS Compliance

- Low Carbon Fuel Standard
  - This should be selected only if the generation subject to this claim will be used for a Low Carbon Fuel Standard Claim. The use of this retirement type is subject to the rules and regulations of any state, federal, or provincial low carbon fuel standard program.

- Renewable Fuel Standard
  - This should be selected only if the Certificates subject to this claim will be used for the United States Environmental Protection Agency Renewable Fuel Standard. Use of this retirement type is subject to official rules and regulations of the Renewable Fuel Standard.

Once you have selected the Retirement Type and completed the required State, Year and Quarter detail fields, select "Next".
Select the Retirement Account that is assigned to the Washington Clean Fuel Standard. You can search for the Retirement Accounts within your Organization or select them from the populated list. Select “Review” to confirm the Retirement.

The final screen will ask you to review the Retirement, please verify that the information entered is correct, once "Retire" is selected you are unable to make changes to the transaction.
After you Select “Retire” you will then see the screen below and are given the option to download the Transaction Receipt and view the transaction in the history tab.
Retired RTCs can be viewed from the Certificate Dashboard, under the Retired tab. To download a CSV or pdf of retirements navigate to the Retired tab and use the download arrow located in the top right of the report.