

Proposal to Provide Customer-Centric Registry Platform Services to Western Interconnection Stakeholders

Submitted by CleanCounts
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Executive Summary

CleanCounts, a nonprofit and North America's most expansive clean energy registry, proposes to provide a customer-centric, tech-forward, and climate-aligned registry platform for stakeholders in the Western Interconnection.

Our platform already delivers **every capability identified in WECC's RFP**—and more—while offering a **seamless, low-risk continuity plan** that eliminates what WECC has identified as a “severe integration risk” of building and moving customer data into a new system.

CleanCounts has invested decades of combined registry expertise and millions of dollars into building a secure, scalable, and user-friendly platform that serves compliance and voluntary markets across the continent. CleanCounts *directly* manages 13 compliance programs across six states/provinces in the U.S. and Canada. In compliance markets where our engineering team works directly with customers and regulators, we have not had a single prolonged service interruption/issue going back to the beginning of our ticketing system in 2017.

Separately, CleanCounts has an agreement with WECC to support them with software and services for the nine compliance programs in the Western Interconnection. With the Western Interconnection, CleanCounts has not had the kind of direct stakeholder engagement that we have in our other compliance program states/provinces. By selecting CleanCounts, Western Interconnection stakeholders can avoid a risky, costly, and time-consuming build, while ensuring responsive and high-quality service.

Organizational Overview

CleanCounts (formerly M-RETS) is a nonprofit with nearly 20 years of experience developing and operating high-integrity energy attribute certificate (EAC) registries.

- **40+ software engineers** with 510 cumulative years of development experience
- **117 combined years** of CleanCounts registry-specific software experience
- **Ten years of clean audits** (aka “unqualified audit reports”) from CliftonLarsonAllen
- Registry platform currently responsible for issuing **more than 40% of all RECs in North America** (2024)
- Proven delivery of **complex, compliance-driven functionality** in collaboration with multiple U.S. state, Canadian provincial, and regional regulators.

Understanding Objectives and Risks

WECC's recent public statements and board decisions introduce three major risks to Western REC markets:

1. **Structural Risk** – Divestiture from WREGIS into a new, standalone entity without existing shared services (HR, finance, IT, legal, office).
2. **Product Risk** – Building duplicative registry software from scratch as a “minimum viable product” with fewer features than the current system and no transparency of included features to WREGIS governance or stakeholder committees.

3. **Integration Risk** – Migrating stakeholder data to a new platform before Jan. 2028, which WECC itself has identified as “severe.”

CleanCounts’ proposal **eliminates all three risks** by keeping the system and data where they are today while delivering all requested functionality at current rates.

A Continuity- and Customer-First Approach

CleanCounts’ approach is grounded in maintaining stability for compliance and voluntary market participants and bringing in our best-in-class customer service team and ticketing system.

- **No Data Migration Risk** – Stakeholders’ data remains in the current secure environment, avoiding the costs and severe integration risk of a transfer.
- **Rate Stability** – Freeze today’s existing WREGIS Organization subscription and transaction fees for compliance markets through December 31, 2029.
- **Return of Stakeholder Funds** – Enable WECC to return the projected \$7 million in reserve funds earmarked for duplicative software development to WREGIS customers.
- **Full Feature Set from Day One** – All existing WREGIS functionality is available immediately, plus benefits that go beyond this RFP’s requirements including:
 - 3-6 week target approval time for DGGs
 - 1-5 day approval timeline for individual generators
 - Regulatory account support at no cost
- **Unmatched Customer Service** – CleanCounts Registry Administrators provide timely, knowledgeable, and friendly service.
 - In just the last three years CleanCounts Registry Administrators have:
 - Handled more than 19,900 tickets from more than 6,100 unique contacts
 - Solved 73% of tickets in one touch
 - Maintained a median first reply time of less than 3.5 hours
 - Maintained a median *full resolution* time of 16 hours

Technical Capabilities

CleanCounts built its **entire software stack from scratch** in 2017, enabling rapid, secure, and flexible feature development. With decades of software experience, CleanCounts enables direct engagement of stakeholders with software design and engineering teams, eliminating the intermediaries and miscommunication that contribute to undocumented edge cases.

Core Platform Features (Already Operational):

- REC issuance, transfer (internal and external), and retirement
- Multi-jurisdiction compliance tracking
- Advanced reporting and analytics
- Secure multi-factor authentication
- “Programs” module to simplify compliance processes
- Intuitive, modern user interface
- Encrypted data storage and transfer
- Advanced, fully documented API with every general subscription

Scalability & Reliability:

- Platform supports millions of transactions annually
- Modular architecture for rapid deployment of new programs

CleanCounts complies with all applicable North American EAC data integrity standards and maintains full audit trails for all transactions.

Climate-Aligned Functionality

CleanCounts' platform is uniquely positioned to support Western states' ambitious climate and clean energy mandates, and its robust voluntary market. With CleanCounts, stakeholders will have flexibility to implement new and diverse program rules across Western jurisdictions.

Implementation Plan

Because CleanCounts' system already delivers the required functionality and customer data already resides safely within the platform, stakeholders can focus on system improvement and new feature development.

Key Steps:

1. **Stakeholder Communication** – Coordinated messaging with WECC to reassure continuity.
2. **Regulatory Alignment** – Work with state and provincial regulators to confirm compliance recognition.
3. **Ongoing Feature Enhancements** – Implement agreed-upon roadmap items with stakeholder input.

Pricing Proposal

This proposal provides cost certainty to existing stakeholders and enables WECC to **return back to customers the projected \$7 million of stakeholder funds** held in reserves. CleanCounts will **maintain today's existing WREGIS compliance market fees** through December 31, 2029.

Why CleanCounts?

1. **Proven Platform** – All required features are already live and in daily use.
2. **Risk Elimination** – No costly, high-risk data migration; no need to build from scratch.
3. **Cost Stability** – Rate freeze versus WECC's stated plan for higher costs.
4. **Innovation Track Record** – Hourly RECs, green hydrogen, RNG—all industry firsts.
5. **Proven Financial Management** – Ten years of clean audits.
6. **Nonprofit Mission** – All revenues reinvested in platform improvement that drive stakeholder value.

Conclusion

Taking a **customer- and continuity-first approach**, CleanCounts will provide Western Interconnection stakeholders all the tech-forward features of today's software, without the risk and cost of starting over.

We welcome the opportunity to discuss this proposal further and invite regulators to attend our [online Q&A](#) on Friday, Aug. 29 at 8:00 am Pacific or our in-person luncheon 12-1:30pm on Friday, Sept. 5 at the Renewable Energy Markets conference (room 335C).

Email questions to west@cleancounts.org.

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