

# RECOMMENDATIONS FOR, AND BENEFITS OF, RPS DATA COLLECTION AND REPORTING

CESA RPS Summit  
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# RPS Compliance Data: Why?

## ***Letter of the Law***

- 1) Identify whether *individual* supplier obligations are met;
- 2) Understand whether a state's *overall* RPS target is achieved; and
- 3) Determine whether *adjustments* are necessary to meet RPS policy objectives, maximize ratepayer benefits, and maintain market balance.



# RPS Compliance Data: Why?

## *Market Implications*

- 1) What is the market supply / demand balance?
- 2) Which technologies are driving RPS compliance?
  - a. Where are they from? (States / Control Areas)
  - b. Do large projects stand out?
- 3) How are flexibility mechanisms like *compliance banking* being used?
- 4) How should my organization adapt to this market information?



# Observations

1. Quantitative data are *very* important to market analysts, public & private
  - a. Identify Trends: supply v. demand, project pipeline,
  - b. Develop strategies: contract duration/volume; banking
  
2. Final compliance data is determine, and owned, by the regulator (not the market participant)
  - a. Bank balance, for example (actually carry-forward of excess compliance)
  
3. High quality RPS program data, when publicly available, will inform sound business and investment decisions and facilitate policy objectives.



# Recommendations (1)

1. Create a protocol to collect, analyze and report data to all stakeholders
  - a. Create a template to capture data (external)
  - b. Create a template to aggregate data (internal)
  - c. Create comprehensive and clear summaries
  - d. Centralize the data (i.e. a report, a website)
  - e. Label everything clearly (units, years, etc.)
  - f. Be consistent from year to year



# MA DOER - RPS & APS 2013 Annual Compliance Filing

## SECTION 2 Allocation of 2013 Retail Load Obligation by Contract Date

**Enter** here the name of the Retail Electricity Supplier! It will appear on all other worksheets.

### TABLE ONE: Allocation of 2013 Retail Load Obligation by Contract Date

*Information on this spreadsheet will be kept confidential by MA DOER by its authority under M.G.L. c. 25A, sec. 2. (DOER will use the data aggregated from these tables in the same manner as Exempt Contract data from Table 7, as seen in the Annual Compliance Report for 2012.)*

The tables on this worksheet enable Retail Electricity Suppliers (both regulated utilities and competitive suppliers) to document by month in CY 2013 the allocation of Retail Load served under contracts executed or extended (a) before June 7, 2013, as contrasted to (b) on or after that date. The portion of the load served under (a) pre-6/7/13 contracts are subject to a the Solar Carve-Out Minimum Standard of 0.2744%, while the portion served under (b) the later contracts are subject to the SCO Minimum Standard of 0.3833%. ALL 2013 Filers must provide the information indicated in the tables of this Worksheet. The data will be copied to appropriate other tables in the 2013 Compliance Workbook. Per 225 CMR 14.07(2)(a)2.

Also see Filing Instructions pages vi-xiii -

Enter data only in cells below that are clear (white) or very light yellow.

Cells that are light green or light blue have formulas and are protected.

### Table 1A: Allocation by month of 2013 Retail Load Obligation by date of contract served

Data Type	Month & Year	Total Electricity Supplied each Year under all contracts (per 90-Day Resettlement figures from the utilities/ISO-	Number of pre -6/7/2013 contracts each Month	Total Electricity Supplied each Year under contracts executed or extended before 6/7/2013	Total Electricity Supplied each Year under Contracts executed or extended on or after 6/7/2013
		MWh	#	MWh	MWh
Actual	Jan 2013				0
Actual	Feb 2013				0
Actual	Mar 2013				0



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**TABLE TWO: RPS Class I Annual Compliance Calculations**

A	B	C	D	E	F	G	H	I
	Sub-Account and/or Product Name	Total Electricity Sold in CY 2013 for each Retail Electricity Product, as defined in 225 CMR 14.09(2)(b) [from Table 1B, col. D]	CY 2013 NEPOOL GIS RPS Class I Generation Certificates, as defined in 225 CMR 14.09(2)(c)	CY 2013 Attributes NOT documented by Settled NEPOOL GIS RPS Class I Generation Certificates	RPS Class I Generation Attributes Banked from 2011 Annual Compliance	RPS Class I Generation Attributes Banked from 2012 Annual Compliance	CY 2013 Alternative Compliance Credits, from ACPs [=J-(D+E+F+G)]	Total of columns D through H for each Product or Product subtotal
		MWh	MWh	MWh	MWh	MWh	MWh	MWh
1		0	0				0	0
2		0	0				0	0
3		0	0				0	0
4		0	0				0	0
5		0	0				0	0
6		0	0				0	0
7		0	0				0	0
8		0	0				0	0
9		0	0				0	0
10		0	0				0	0
11		0	0				0	0
12		0	0				0	0
13		0	0				0	0
14		0	0				0	0
15		0	0				0	0





# MA Compliance Summary Table

	2013	2012	2011
<b>CY Retail Sales (= Retail Load Obligation) <sup>40</sup></b>	<b>49,252,929</b>	48,992,430	49,386,169
<i>CY Minimum Standard (% obligation) <sup>41</sup></i>	<i>7.714%</i>	6.837%	5.8373%
<b>CY aggregated compliance obligation <sup>42</sup></b>	<b>3,799,402</b>	3,349,611	2,882,823
<b>Total RECs from CY generation</b>	<b>4,064,043</b>	3,056,894	2,613,122
<i>minus</i> <b>CY total surplus RECs</b>	<b>(330,272)</b>	<b>(70,022)</b>	<b>(107,805)</b>
<b>Net CY RECs for CY obligation</b>	<b>3,733,771</b>	2,986,872	2,505,317
<i>plus</i> <b>Banked from pre-CY surpluses</b>	<b>31,102</b>	107,351	271,303
<b>Total RECs used for CY obligation</b>	<b>3,764,873</b>	3,094,223	2,776,620
<i>plus</i> <b>Total ACP Credits</b>	<b>31,642</b>	255,388	106,203
<b>Total for compliance obligation <sup>43</sup></b>	<b>3,796,515</b>	3,349,611	2,882,823
<b>Surplus Attributes banked forward <sup>44</sup></b>	<b>328,984</b>	69,916	107,804
<b>ACP proceeds (rounded)</b>	<b>\$2,065,273</b>	\$16,350,132	\$6,598,386



# Recommendations (2)

## 2. Create a certified RPS Generator List

- a. Project name, fuel type, capacity, RPS effective date
- b. Update it regularly

## 3. Avoid Overreliance on Self-Reporting

- a. Validate data btw system administrators, tracking systems, generators, competitive suppliers and utilities

## 4. Avoid over-generalized data that could be misleading

- a. RPS cost data are the best example



# Barriers, Benefits & Questions

- Establishing these systems will take more time in the short-run, but save substantial time in the long-run.
- How can we:
  - save time?
  - increase accuracy?
  - increase usefulness?
  - gain more market insight?





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