



COMMONWEALTH OF MASSACHUSETTS

Charles D. Baker, Governor

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2016 MA RPS & APS Compliance Filing Webinar

May 23, 2017

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**RPS & APS
Compliance
Webinar**

May 23, 2017

Review of Filing Process

- 2014 & 2015 banked totals provided on April 28th
- Retail Load Obligations provided on May 2nd
- Compliance Workbook/Instructions on May 19th
- End of 2016 trading year is June 15th
- Alternative Compliance Payments (ACPs) must be submitted to the Massachusetts CEC by June 27th
- Compliance filings due no later than Monday, July 3rd
- Filers must provide *both* electronic and hard copies of filing
- ***NEW!*** *Obligatory* naming & formatting convention for all quarterly “Settled Certificates” GIS reports
- Electronic copies must be submitted only to DOER.RPS@state.ma.us.

Review of Applicable 2016 Compliance Exemptions & Variations

- **Pre-6/28/13 Minimum Standard (%) Bifurcation for Solar Carve-Out**
 - Minimum Standard % depends on Contract dates
 - Load under pre-6/28/13 contracts has 0.9801% Minimum Standard
 - Load under later contracts has 1.7568% Minimum Standard
 - For *all* suppliers
- **Pre-4/25/14 Minimum Standard Exemption for Solar Carve-Out II**
 - Exempts all Load served under retail contracts executed before 4/25/2014
 - Load under later contracts has 0.7851% Minimum Standard
 - For competitive retail suppliers *only*
- **For CY 2017 (not 2016): Pre-5/8/16 Minimum Standard (%) Bifurcation for Solar Carve-Out II**

Compliance Strategies and Best Practices

- Auction [Re-minted] SRECs
 - 2013 Auction SRECs **must** be used for 2016 compliance.
 - 2014 Auction SRECs **must** be used for 2016 compliance.
 - 2015 Auction SREC Is can be used for 2016 and 2017 compliance.
- Auction [Re-minted] SREC IIs
 - 2015 Auction SREC IIs can be used for 2016 and 2017 compliance.
- All Auction SRECs for use in 2017 should remain in your main GIS account or your Banked account, **not** in your state-specific subaccount.

	Compliance Year →	CY 2016	CY 2017
SREC Vintage	2013	Yes	No
	2014	Yes	No
	2015	Yes	Yes

	Compliance Year →	CY 2016	CY 2017
SREC II Vintage	2014	N/A	N/A
	2015	Yes	Yes

- For the Compliance Workbook, do not list Auction Re-minted SRECs or SREC IIs in the Banked columns!

Compliance Strategies and Best Practices

- Banking certificates
 - DOER recommends that Suppliers avail themselves of their ability to bank certificates whenever possible
 - Banking limits are expressed as a percentage of a Supplier's 2016 compliance obligation
 - Banked certificates can be used in one of the two subsequent compliance years
 - Banking limits are as follows for specific classes:
 - RPS Class I – 30%
 - SREC I and SREC II – 10%
 - RPS Class II Renewable – 30%
 - RPS Class II Waste-to-Energy – 5% (had been 0% for 2014 & 2015)
 - APS – 30%
- Settle all certificates in MA subaccounts at GIS before June 15th
 - Unsettled & other “Errant” certificates create accounting issues, require additional documentation from Suppliers, and make it difficult for DOER to reconcile numbers.
 - DOER requests that all suppliers settle certificates before the close of the trading year. (Auction Reminted SRECs/SREC IIs excepted)

ACP Payments

- ACP Payments must be made to the Massachusetts Clean Energy Center (MassCEC) by Tuesday June 27th.
- ***NEW!*** ACP wire instructions and ACP Notification are now in a new last tab of the *Workbook*: tab **N**.
- You must itemize your payments according to the different types of ACPs:
 - Class I (RECs)
 - Class I Solar Carve-Out (SRECs) Class I Solar Carve-Out II (SREC IIs)
 - Class II Renewable Energy (Class II RECs)
 - Class II Waste-to-Energy (WECs)
 - Alternative Portfolio Standard (AECs)
- The MassCEC will provide an ACP Receipt that identifies ACP Credits (MWh) & Payments (\$) for each type of ACP that you remit.
- ACP Receipts must be included as part of your emailed filing only.
- If you have not received ACP Receipts by July 3rd, you should ***not*** delay email submission of your Compliance Filing. Instead, email the Filing on time, and then email the ACP Receipts as soon as you receive them.

2016 SREC Auction(s)

- The 2016 SREC Auction will be held before the end of July
- DOER expects to have significant auction volume in SREC II, but does not expect a large volume in SREC I
- All deposits into the auction account must be made by June 15th
- Bidders will need to register by submitting a qualification form to DOER's auction agent
- DOER expects considerable bidder interest and strongly encourages all retail suppliers to actively participate in this year's auction
- Represents a significant opportunity for suppliers to reduce their future compliance costs

Ongoing Rulemakings

- APS Rulemaking
 - Expecting to file in the next couple of weeks
 - Adding new eligible renewable thermal technologies
- SMART Rulemaking
 - Expecting to file in the next couple of weeks
 - All qualified projects classified as Class I
- 83D and 83C Procurements
 - Adding supply to Class I in 2020s

Links & Contacts

- [Annual Compliance Filing Forms and Guidelines](http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/retail-electric-supplier-compliance/annual-compliance-filing-forms-and-guidelines.html) webpage for the Compliance Workbook, Instructions, Cover Email, and Guidelines:
<http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/retail-electric-supplier-compliance/annual-compliance-filing-forms-and-guidelines.html>.
- Assistance:
 - Kara Sergeant: kara.sergeant@state.ma.us, 617-626-7392
 - Kaitlin Kelly: kaitlin.kelly@state.ma.us, 617-626-7343
 - Howard Bernstein: howard.bernstein@state.ma.us
 - Mike Judge: michael.judge@state.ma.us
- General Program Info: www.mass.gov/energy/rps