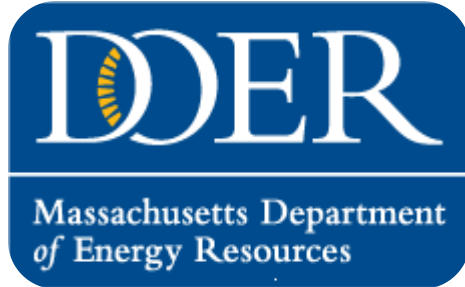


Creating a Clean, Affordable and Resilient Energy Future for the Commonwealth



**COMMONWEALTH OF
MASSACHUSETTS**

Charles D. Baker, Governor

Karyn E. Polito, Lt. Governor

Kathleen A. Theoharides, Secretary

Patrick Woodcock, DOER Commissioner

Martin Suuberg, MassDEP Commissioner

**2019 MA RPS/APS/CES/CPS
Compliance Filing Webinar
May 29, 2020**

**RPS, APS,
CES, CPS
Compliance
Webinar**

May 29, 2020

John Wassam, RPS/APS Program Manager (DOER)

**Kaitlin Kelly, Deputy Director Renewables and
Alternative Energy Development (DOER)**

Jordan Garfinkle, Environmental Analyst (MassDEP)

Sue Ann Richardson, Environmental Analyst (MassDEP)

2019 Compliance Filing Process

- 2017 and 2018 banked certificates availability provided in April
- Retail Load Obligation provided in May
- Compliance Workbook posted and dated on May 25th
- End of 2019 trading year is midnight, June 15th!
- ACPs for RPS and APS must be submitted to the MassCEC by Friday, June 26th
- ACPs for CES must be submitted to the MassDEP within 30 days of separate billing by MassDEP
- Compliance filing due no later than on Wednesday, July 1st
- Filers must provide *both* electronic and hard copies of filing. Electronic copies must be submitted to:
doer.rps@mass.gov

What's New?

- First year of banking for Clean Energy Standard (CES)
 - Banking allowance is 30%.
 - **HOWEVER: 2019 BANKED CERTIFICATES CANNOT BE USED FOR COMPLIANCE UNTIL 2021**
- First year of compliance for the Clean Peak Standard (CPS)
 - 2019 Minimum Standard is 0%. No worksheet will be shown.

Banked Certificates

- Banking limits are expressed as a percentage of a Supplier's 2019 compliance obligation by class
- Banked certificates can be used in either of the two subsequent compliance years (except 2019 banked CES as noted above)
- Banking 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%
 - APS 30%
 - CES 30%

Settled Certificates

- Please be sure to settle all certificates in MA sub-accounts in GIS by June 15th
 - Including any SREC and/or SRECI re-minted certificates that are to be applied to your obligation
 - Including any certificates that are intended to be “Banked” by DOER
- Unsettled and other “Errant” certificates create accounting issues, require additional documentation, and make it difficult for DOER to reconcile numbers

Solar Carve Out Practices

- Auction [Re-minted] SRECs
 - 2017 Auction SRECs *must* be used for 2019 compliance
 - 2018 Auction SRECs may be used for 2019 and/or 2020 compliance
- Auction [Re-minted] SREC IIs
 - 2017 Auction SRECs IIs must be used for 2019 compliance
 - 2018 Auction SREC IIs can be used for 2019 and/or for 2020 compliance
- All Auction SRECs for compliance use in 2020 should remain in your main GIS account or your Banked account, **not** in your Massachusetts sub-account
- *DO NOT list Auction Re-minted SRECs or SREC IIs in the Banked columns!*

	Compliance Year →	CY 2019	CY 2020
SREC Vintage	2017	Yes	No
	2018	Yes	Yes

	Compliance Year →	CY 2019	CY 2020
SREC II Vintage	2017	Yes	No
	2018	Yes	Yes

Bifurcation for Solar Carve-Out

Minimum Standard (%)

- For contracts executed or extended on or before 6/28/13:
 - Minimum Standard of 1.0978%
- For contracts executed or extended after 6/28/13:
 - Minimum Standard of 1.7458%

Trifurcation of Solar Carve-Out II

Minimum Standard (%)

- For contracts executed or extended on or before 4/25/2014:
 - This exempt load has a Minimum Standard of 0%
- For contracts executed or extended after 4/25/2014, but on or before 5/8/2016:
 - This exempt load has a Minimum Standard of 2.3196%
- For contracts executed or extended after 5/8/2016:
 - Minimum Standard of 3.9141%

SREC Auction(s)

- The SREC Auction will be held before the end of July.
- DOER does not expect to have significant auction volume in SREC I or SREC II
- 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
- The auction represents an opportunity for suppliers to manage their future compliance costs

ACP Payments (for RPS/APS)

- ACP Payments should be made to the Massachusetts Clean Energy Center (MassCEC) by Friday, June 26th
- ACP wire instructions will be sent separately by encrypted email.
- The ACP Notification is the last tab of the *Workbook*: tab **N**.
Please email a copy of tab N to MassCEC
- The MassCEC will return to supplier a signed ACP Receipt (tab N)
- The ACP Receipt must be included as part of your emailed filing only
- If you have not received ACP Receipt by July 1ST, you should **not** delay email submission of your Compliance Filing
- ACP payments for CES will follow a different process.

Clean Energy Standard (MassDEP)

- 2019 CES Minimum Standard is 18% which is 4% above RPS Class I Minimum Standard of 14%
 - RPS Class I obligation counts towards CES
 - All 2019 RPS Class I RECs are also CES certificates (CECs)
- Exemptions for eligible existing contracts:
 - Must submit to MassDEP “Exemptions for Existing Contracts” form, available on the MassDEP CES web page
 - In order to be eligible, retail sellers must have also submitted required information by 12/31/2017 (*projected* volume of eligible MWhs)
 - NOTE: 2019 is last year of eligibility for exemption
- CES ACP funds must be paid separately from the RPS ACP funds
 - Upon receiving the compliance workbooks on July 1, MassDEP will send invoices to all retail sellers who generate Alternative Compliance Credits
 - Table 15b calculates total CES ACP owed to MassDEP
 - Payment must be made in full within 30 days of receiving the invoice

GHG Reporting (MassDEP)

- 310 CMR 7.75(9)(c)4. requires utilities and competitive suppliers to report their MWh and emissions data. This requirement is satisfied by the submission of the GHG tab in the *Workbook* and the NEPOOL-GIS “Settled” certificates report (as submitted with RPS/APS/CES/CPS *Workbook*).
- The MWh and CO₂e from the GHG tab will need to be entered on the AQ32 spreadsheet that must be submitted to MassDEP by the 15th of the second September following each year (2019 report will be due by 9/15/2021).

Other Issues

- Notary signature still required
 - Will accept virtual if state approved
 - In Massachusetts, notary can witness virtually but also requires affidavit by notary that he or she witnessed signing
- Can use regular mail to send hard copies
 - No one at physical location to receive express mail
 - Mail is only periodically picked up at physical location

Contacts

- **RPS/APS email contact:**
doer.rps@mass.gov
- **CES email contact:**
climate.strategies@mass.gov
- **RPS, APS, CPS and overall questions:**
John Wassam doer.rps@mass.gov
- **For SREC, SREC II and SREC Auction questions:**
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- **For CES questions:**
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- **For GHG reporting:**
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