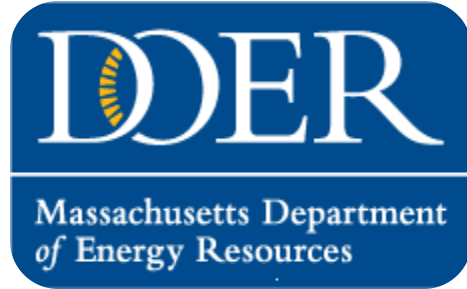


Creating a Clean, Affordable and Resilient Energy Future for the Commonwealth



**COMMONWEALTH OF
MASSACHUSETTS**

Charles D. Baker, Governor

Karyn E. Polito, Lt. Governor

Kathleen A. Theoharides, Secretary

Patrick Woodcock, DOER Commissioner

Martin Suuberg, MassDEP Commissioner

**2020 MA RPS/APS/CES/CPS
Compliance Filing Webinar
May 27, 2021**

John Wassam, RPS/APS Program Manager (DOER)

Emily Lamb, Environmental Analyst (MassDEP)

Sue Ann Richardson, Environmental Analyst (MassDEP)

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

May 27, 2021

2020 Compliance Filing Process

- 2018 and 2019 banked certificates availability provided in April
- Retail Load Obligation provided in May
- 2020 Compliance Workbook will be posted today
- End of 2020 trading year is midnight, June 15th!
- ACPs for RPS, APS and CPS must be submitted to the MassCEC by Friday, June 25th so receipt returned in time
- ACPs for CES must be submitted to the MassDEP within 30 days of separate billing by MassDEP
- Compliance filing due no later than on Thursday, July 1st
- Filers must provide electronic copy of filing, GIS settlement report and MassCEC ACP receipt, if necessary, to: ***doer.rps@mass.gov***

What's New?

- Notarization not required on Authorization Form (Tab A. Authztn)
- Elimination of requirement to send hard copy!
- Preference to have Certification and Authorization printed, signed, scanned and saved as pdf and emailed with filing.

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What's New (continued)?

➤ Banking for Clean Energy Standard (CES)

2019 BANKED CERTIFICATES CANNOT BE USED FOR COMPLIANCE UNTIL 2021 PER REGULATION 310 CMR 7.75 (5) (b) 1.

“Beginning in 2021...”

➤ No load exemption for CES

➤ RPS Class I

- Load exemption for contracts executed or extended before 01/01/2019.
- Exempt load Min Standard 2020/2021: 15%/16%
- Non-exempt load Min Standard 2020/2021: 16%/18%

What's New (continued)?

➤ Clean Peak Standard

- 2020 Minimum Standard is 1.5%. New worksheet for CPS in Compliance Workbook (Tab 11. CPS)
- Load exemption for contracts executed or extended before 01/01/2020.
 - Exempt load Minimum Standard: 0%
 - Non-exempt load Minimum Standard: 1.5%
- LSE's will have to access the My MA CPS CPEC Retirements report under the Account Holder Reports to report their settled CPEC certificates in csv format

Banked Certificates

- Banking limits are expressed as a percentage of a Supplier's 2020 compliance obligation by class.
- Banked certificates can be used in either of the two subsequent compliance years except for CPS which allows three years and the exception for the use of 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%
 - CPS 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 over and above minimum obligation that are intended to be “Banked” by DOER
 - Two separate reports for settled certificates: one for CPECs and one for everything else (My Certificates Disposition) *BE SURE TO CLICK SETTLED ONLY.*
 - Email 2020 settled certificates reports in csv format as one entire year.
- 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
 - 2018 Auction SRECs *must* be used for 2020 compliance
 - 2019 Auction SRECs may be used for 2020 and/or 2021 compliance
- Auction [Re-minted] SREC IIs
 - 2018 Auction SRECs IIs must be used for 2020 compliance
 - 2019 Auction SREC IIs can be used for 2020 and/or for 2021 compliance
- All Auction SRECs for compliance use in 2021 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	2018	Yes	No
	2019	Yes	Yes

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

Bifurcation for Solar Carve-Out

Minimum Standard (%)

- For contracts executed or extended before 6/28/13:
 - Zero reported in 2019
 - Minimum Standard of 0.9867%
- For contracts executed or extended on or after 6/28/13:
 - Minimum Standard of 1.6116%

Trifurcation of Solar Carve-Out II

Minimum Standard (%)

- For contracts executed or extended before 4/25/2014:
 - This exempt load has a Minimum Standard of 0%
- For contracts executed or extended on or after 4/25/2014, but before 5/8/2016:
 - This exempt load has a Minimum Standard of 2.2040%
- For contracts executed or extended on or after 5/8/2016:
 - Minimum Standard of 3.8011%

SREC Auctions

- The SREC Auction will be held before the end of July.
- DOER does not expect to have significant auction volumes 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/CPS)

- ACP Payments for RPS,/APS/CPS should be made to the Massachusetts Clean Energy Center (MassCEC) by Friday, June 25th so that a receipt can be returned in time to include with filing.
- 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 if made ACP payment.**
- 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 received one (i.e., made an ACP payment)
- If you have not received ACP receipt by July 1ST, you should **not** delay email submission of your Compliance Filing
- ACP payments for CES follow a different process.

Clean Energy Standard (MassDEP)

- All 2020 RPS Class I RECs also represent CES certificates (CECs)
- No contract load exemption for CES in 2020
- CES ACP funds must be paid separately from the RPS ACP funds
 - Upon receiving the completed compliance workbooks on July 1, MassDEP will send invoices to all suppliers that generated 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)

- First Report: 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 completion and submission of the GHG tab in the *Workbook* and the NEPOOL-GIS “Settled” certificates report (as submitted with RPS/APS/CES/CPS *Workbook*).
- Second Report: 310 CMR 7.75(9)(c)3. requires utilities and competitive suppliers to enter their MWh and CO₂e from the GHG tab onto the AQ32 spreadsheet that must be submitted to MassDEP by the 15th of the second September following each calendar year (the 2020 report will be due by 9/15/2022).
- If you have any questions regarding the completion or submission of either of these reports, please contact Sue.Ann.Richardson@mass.gov, or leave a voicemail at 617-348-4098 and your call will be returned.

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 CES questions:**
Emily Lamb emily.lamb@mass.gov
- **For GHG reporting:**
Sue Ann Richardson sue.ann.richardson@mass.gov