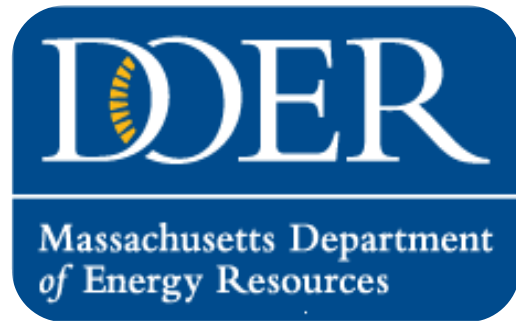


Creating a Clean, Affordable and Resilient Energy Future for the Commonwealth



**COMMONWEALTH OF
MASSACHUSETTS**

Maureen T. Healey, Governor

Kimberley Driscoll, Lt. Governor

Rebecca L. Tepper, EEA Secretary

Elizabeth Mahony, DOER Commissioner

Bonnie Heiple, MassDEP Commissioner

**2022 MA RPS/APS/CPS/CES
Compliance Filing Webinar
May 25, 2023**

John Wassam, RPS/APS Program Manager (DOER)

Jason Brown, Environmental Analyst (MassDEP)

Sue Ann Richardson, Environmental Analyst (MassDEP)

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

May 25, 2023

2022 Compliance Filing Process

- Available 2020 and 2021 banked certificates for 2022 compliance provided in April
- Retail Load Obligation provided in mid-May
- 2022 Compliance Workbook and Instructions are posted
- End of 2022 trading year is midnight, June 15th!
- ACPs for RPS, APS and CPS must be submitted to the MassCEC by Wednesday, June 28th so receipt returned in time
- ACPs for CES must be submitted to the MassDEP within 30 days of separate invoice sent by MassDEP
- Compliance filing due no later than COB Monday, July 3rd
(*July 1 is a Saturday*)
- Filers must provide 1) electronic copy of filing, 2) GIS settlement report, 3) CPEC settlement report, and 4) RPS/APS/CPS ACP receipt from MassCEC, if necessary, to: ***doer.rps@mass.gov***

What's New?

- Wire instructions for MassCEC have changed
- MassCEC will send via encrypted email its wire instructions.

Reminders

- Notarization not required on Authorization Form (Tab A. Authztn)
- Not necessary to send hard copy!
- E-signature acceptable
- Alternative is to have Certification and Authorization printed, signed, scanned and saved as pdf and emailed with filing.
- Please run GIS reports a couple days after June 15th so all transactions get reported

Banked Certificates

- Banking limits are expressed as a percentage of a Supplier's 2022 compliance obligation by class.
- Banked certificates can be used in either of the two subsequent compliance years except for CPS which allows three years.
- Banking limits for each class are:

• 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%*
• CES-E	0%

* CES banking limit is 30% of the obligation that is in excess of the RPS Class I obligation

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 (auction) certificates that are to be applied to your compliance obligation. Include as certificates applied for compliance (not Errant or Banked)
 - Including any certificates over and above minimum obligation that are intended to be “Banked” with DOER
 - Including any RPS Class I certificates over and above the minimum obligation that represent voluntary or green RECs (but not those reported in the Reserve account). The voluntary or green RECs should be reported on Table 15 Green Power Product Calculation (Tab 15. Green).
 - Two separate GIS reports for settled certificates: one for CPECs and one for everything else (My Certificates Disposition Report) BE SURE TO CLICK SETTLED ONLY.
 - Email 2022 settled certificates reports in csv format as one entire year.

Solar Carve Out Practices

- Auction [Re-minted] SRECs
 - 2020 Auction SRECs *must* be used for 2022 compliance (0)
 - 2021 Auction SRECs may be used for 2022 and/or 2023 compliance
- Auction [Re-minted] SREC IIs
 - 2020 Auction SRECs IIs must be used for 2022 compliance
 - 2021 Auction SREC IIs can be used for 2022 and/or for 2022 compliance
- All Auction SRECs intended for compliance BEYOND 2022 should remain in your main GIS account, ***not*** in your Massachusetts sub-account (THEY WILL BE CONSIDERED SETTLED)
- *DO NOT list Auction Re-minted SRECs or SREC IIs in the Banked columns!*

	Compliance Year →	CY 2022	CY 2023
SREC Vintage	2020	Yes	No
	2021	Yes	Yes

	Compliance Year →	CY 2022	CY 2023
SREC II Vintage	2020	Yes	No
	2021	Yes	Yes

Bifurcation for Solar Carve-Out

Minimum Standard (%)

- For contracts executed or extended before 6/28/13:
 - Minimum Standard of 0.8801%
- For contracts executed or extended on or after 6/28/13:
 - Minimum Standard of 1.5432%

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, and on or before 5/8/2016:
 - This exempt load has a Minimum Standard of 2.3866%
- For contracts executed or extended after 5/8/2016:
 - Minimum Standard of 4.0856%

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

Clean Energy Standard (MassDEP)

- All 2022 RPS Class I RECs also represent CES certificates (CECs) and can be used for CES compliance
- Banked RPS Class I RECs cannot be used for CES compliance and vice versa
- The banking limit is only applied to the incremental CES obligation (i.e., over and above the RPS Class I obligation and not the overall CES obligation)

CES-E (MassDEP)

- CES-E standard (Clean Energy Standard – Existing).
- Separate CES-E generation certificates from existing clean generation units.
- Minimum Standard is 20%.
- Must obtain CES-E certificates. Cannot use CES certificates (or RPS Class I).
- ACP is \$10/MWh.
- No banking ever.
- Exempt load prior to October 4, 2019.

ACP Payments for RPS/APS/CPS Only

- ACP Payments for RPS,/APS/CPS should be made to the Massachusetts Clean Energy Center (MassCEC) by Wednesday, June 28th so that a receipt can be returned in time to include with filing.
- New MassCEC ACP wire instructions will be sent separately by encrypted email from MassCEC.
- **Please email a copy of tab N to MassCEC if making a RPS, APS or CPS ACP payment.**
- The MassCEC will return a signed ACP Receipt (tab N) to supplier
- **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 3rd, you should ***not*** delay email submission of your Compliance Filing

ACP Payments for CES/CES-E

- CES and CES-E ACP monies owed must be paid separately from the RPS/APS/CPS ACP monies owed
 - Upon receiving the completed compliance workbooks on July 3, MassDEP will send invoices to all suppliers that generated Alternative Compliance Credits for CES and/or CES-E.
 - Table 16B calculates total CES ACP owed to MassDEP
 - Payment must be made in full within 30 days of receiving the MassDEP invoice

GHG Reporting (MassDEP) (Tab 14)

- 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 2022 report will be due by 9/15/2024).
- 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 781-686-4237 and your call will be returned.

Contacts

- **RPS, APS, CPS and overall questions:**
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- **For CES/CES-E and MassDEP ACP questions:**
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Sue Ann Richardson sue.ann.richardson@mass.gov
- **For MassCEC ACP payment information:**
MassCEC Finance finance@masscec.com