

2016 Email for RPS & APS Annual Compliance & Webinar, 5-19-17

From: Bernstein, Howard (ENE)
Sent: Tuesday, May 31, 2016 6:41 PM
To: RPS, DOER (ENE)
Cc: Sergeant, Kara (ENE) <Kara.Sergeant@MassMail.State.MA.US>; Kelly, Kaitlin (ENE) <Kaitlin.Kelly@MassMail.State.MA.US>; Judge, Michael (ENE) <Michael.Judge@MassMail.State.MA.US>; James Webb (jwebb@apx.com)
Subject: MA 2016 RPS & APS Annual Compliance Filing Workbook & Instructions

Dear 2016 RPS & APS Compliance Filers,

Attached to this email are two documents:

- **2016 RPS & APS Annual Compliance Filing Instructions** (a Word document), and
- **2016 RPS & APS Compliance Filing Workbook** (an Excel file with 16 tabs/worksheets).

Below this email is DOER's May 12th notice and registration link for the 2016 MA RPS/APS Compliance Filing Webinar that will be held on Tuesday, May 23rd

Please read/review all instructions and worksheets carefully before you begin!

Although this email does not substitute for the attached ***Instructions***, do note the following:

- I strongly ***urge*** you to review the *Instructions* and *Workbook* ***as soon as possible***
- 1. ***IF*** you find any errors in the instructions, forms, or spreadsheets (esp. re formulas), *please notify Kara Sergeant and me by phone or email immediately* so that we can make any necessary corrections and share them with everyone. (This does occur.)
- 2. ***IF*** anything is unclear to you, please also tell us ASAP, and we will do our best to assist.
- 3. ***IF*** you have any technical issues with the spreadsheets in the Workbook, please *email* Kara Sergeant and me at DOER for assistance (see email address above).
- ALL forms are incorporated into the Filing Workbook.
- The former tab 13 has been removed, and a new tab N has been added at the end. But the *order* of the worksheets is unchanged since last year. The *order* of worksheets matches the order of data entry, with appropriate forward linking of data among worksheets. It is important to start at the first tab ("0") and work your way from one sheet to the next.
- The former Table 3 (*ré* pre-2009 contracted Exempt Load for RPS Class II & APS) will be sent only to the one Filer that needs it.

- The Workbook has a table that *calculates your ACP for all six Minimum Standards and a new one that serves as your ACP Notification to the MassCEC.*
- Anything that is new for the 2016 Filing is marked as **NEW!**
- Some instructions are revised or are emphasized with **“NOTE!”**.
- The workbook is formatted to print all pages as Letter size.

All of us on the RPS & APS Team at DOER appreciate any and all suggestions for improving the forms and process of RPS and APS Annual Compliance.

- **DOER suggests** that you not complete **Tables 1B & 1C** until after you determine your best strategy for the use of any *surplus* SRECs and SREC IIs. **Or** you can fill out 1B & 1C in part or in their entirety, then use the result to help you in that determination, and then return to 1B or 1C later if you changed your allocations. The results of Tables 1B & 1C are not critical to completion of other tables, but you ***must*** complete them before sending your Filing. And once you do complete them, you must check their results against the cells of Tables 6 & 7 to which they will be copied.
- **Solar Credit Clearinghouse Auction Reminted SRECs & SREC IIs** are to be treated in the Workbook (Tables 6 & 7) the same as 2016 Certificates, not as “Banked” Certificates. The reason is that, unlike *Banked* Attributes/Certificates from past years, they can remain documented within the GIS.
- **Reminted SRECs** from 2013 have a 3-year shelf life at the GIS and can be used for RPS compliance through CY 2016, while 2014 Reminted SRECs have a 2-year shelf life and also can be used only through 2016. *So 2016 is your last opportunity to use them for compliance.*
- **Reminted SRECs & SREC IIs from CY 2015** are good through 2017.
- **This table shows how many Reminted SRECs are currently available for SCO compliance:**

SREC Vintage	Originally Re-Minted Certificates	Still Available for Compliance	Usage Deadline
2012	38,866	0	2015
2013	142,786	12,027	2016
2014	124,831	36,574	2016
2015	1,898	1,898	2017

- Do ***not*** send a hard copy of the quarterly GIS “My Settled Certificates” reports.
- Follow ***important new instructions*** for the file naming and formatting of the quarterly GIS “My Settled Certificates” reports. If you send those files incorrectly, you will have to replace them.
- **GIS Account usage:**

1. Your REC/SRECs/WECs/AECs must be transferred into your NEPOOL GIS MA Retail Subaccount(s) in order to be used towards MA RPS/APS compliance, including surplus for subsequent banking. Whether you think of "transferring" them to the Subaccount as "settling" them there or "retiring" them there, that is where they go.
2. The *RESERVED Account* at the GIS is **NOT** for settling/retiring your RPS Certificates for MA RPS/APS Compliance. The RESERVED Account is also **NOT** for banking your surplus Certificates. Banking of surplus Certificates for subsequent year compliance is done by settling the Certificates in your MA Retail Subaccount(s) and reporting them for current Compliance.
3. Do **not** leave any Certificates in your *Banked Account*. The Banked Account is only a place to hold unsettled Certificates between quarters *within* a Compliance Year, not banking them *between* Compliance Years. Certificates **left** in your main account or in your Banked Account will **be retired and converted into Residual Mix** at midnight on June 15.
4. However, **Reminted Auction SRECs/SREC IIs** that you plan to use in a future Compliance Year may be left in the Banked Account, since they are encoded for an extended life.

Your emailed Filing (send to doer.rps@state.ma.us **only**, not to anyone's direct email address) **is due by Monday, July 3 and must include the following:**

- **The entire Compliance Filing Workbook** as an MS Excel file (not as PDF). Do **not** delete any worksheets, even if you do not use them, because they are all inter-linked. We expect tabs C & A to be unsigned in the emailed version.
- **All 4 quarterly GIS reports for 2014, "My Settled Certificates", *regardless* of your activity during each quarter, and with nothing revised, deleted or hidden (including info pertaining to other states). Use the **download icon** at the GIS site. This submission **must** be in the "csv" MS Excel format in which they are downloaded, not in PDF format, and *only one quarter per file*. **NEW: They must have filenames specified in the new instructions for Table 5, column D. Incorrectly named/formatted GIS files will not be accepted.****
- ACP Receipts from the MassCEC.
- Any *applicable* "My Unsettled Certificates" reports from the GIS, *if* needed to support Table Four, "Errant Certifs" (also in "csv" Excel format, using the download icon, not PDFs).
- Any other applicable GIS report (also in "csv" Excel format, not PDFs) needed to comply with the [5/24/12 Guideline](#).

Do not delay emailing the rest of the Filing if you have not yet received your ACP Receipts by July

3. Just email the Receipts as soon as they arrive.

Your hard copy Filing (formally due on July 3, but acceptable arriving at DOER during the *same week*) **must include the following:**

- Compliance Filing Workbook (all pages)
- *Signatures* on the Certification and Authorization pages of the Workbook, with *notarization* of the latter, or other applicable Authorization document provided by the *Instructions*.
- Attachments, *if applicable*, especially any Documentation to support Table Four (so-called "Errant Certificates") if the documentation is not available and emailed in Excel format

NOTE: Please do not send *print-outs* of the quarterly GIS "My Settled Certificates" reports.

Finally: important reminders:

- We have **six** compliance standards, each with its own type of GIS certificate.
- **You cannot bank MA Certificates from one year to the next at the NEPOOL GIS.** Rather, you *must* make sure to settle all MA Certificates into MA subaccounts by 6/15 for submission with the 2016 Filing. But Reminted SRECs & SERC IIs have specified, multi-year life spans within the GIS.
- **June 15 is the last day for transferring or settling 2016 Certificates at the NEPOOL GIS.** Any Certificates that are not settled in the correct retail subaccounts by midnight on 6/15 will be transformed irretrievably into Residual Mix certificates of no value for RPS or APS.
- **June 15 is the last day for transferring SREC IIs into the SREC II Solar Clearinghouse Auction Account** at the NEPOOL GIS. DOER advises you to calculate carefully your SREC II compliance needs, taking into account the SCO ACP Rates, the 10% banking limit for the Solar Carve-Outs, and the current and projected state of the market.
- ***If you are new to RPS in MA and do not have a NEPOOL GIS LSE account, contact the GIS Administrator immediately!!***

If you are not the correct person in your organization to receive this email, please forward it to whomever is and CC to me. Thanks.

Do consider attending the Webinar announced below this email!

Good luck, and please do let me and my colleagues at DOER know if we can be of assistance – the sooner the better.

Howard B. Bernstein, Ph.D.

Energy Portfolio Standards (RPS & APS) Program Manager

Massachusetts Department of Energy Resources

100 Cambridge Street, Suite 1020, Boston, MA 02114

O: 617.626.7355 F: 617.626.0030

<http://www.mass.gov/energy/rps>

<http://www.mass.gov/energy/aps>