

**North American Association of Issuing Bodies
Transferring Certificates Across Tracking System Boundaries
Meeting Notes**

December 9, 2005, 2pm-4pm EDT

In attendance:

- Sakis Asteriadis, APX for NEPOOL GIS
- Dave Baker, IL DCEO
- Paul Belval, DBH for NEPOOL GIS
- Robert Burke, ISO NE
- Dan Cleverdon, DC PSC
- Roger Fujihara, DC PSC
- Kevin Hale, NYSERDA
- Paul Helgeson, WI PSC
- Susan Herbert, Terra Choice
- Grace Hu, DC PSC
- Joe Kerecman, PJM EIS
- Bill Short, Ridgewood Power for NEPOOL GIS Markets Committee
- Ed Holt, Ed Holt and Associates for CRS
- Matthew Lehman, CRS
- Aleka Niedermier, CRS
- Ken Schuyler, PJM for PJM EIS
- Devon Walton, APX for NEPOOL GIS
- Sam Swanson, Pace for Clean Power Markets
- Sara Wilcockson, IL DCEO
- Meredith Wingate, CRS

Introduction:

The goals of this call were to:

- discuss next steps for the distribution of the “Best Practices for Preventing Double Counting” document,
- give an update on our previous generator registry discussion,
- address the concerns raised by Dennis and others by email, and
- review and discuss the document titled, “Transferring Certificates Across tracking Systems Boundaries” referred heretofore as Transferring Certificates document

Staff Changes at CRS

Sarah Krasley has moved on to other projects at CRS. Aleka Niedermier is replacing Sarah and will be coordinating meetings and providing administrative support to the NAAIB and this working group.

Double Counting Best Practices Document – Next Steps

It was suggested in an earlier call that the Best Practices for Preventing Double Counting should be circulated to a larger stakeholder group for comment. There was a discussion to determine the next steps needed to finalize this document. Meredith proposed the following, which was agreed upon by the group:

1. Meredith and Paul Belval will work together to incorporate the comments from NEPOOL. The revised version will be sent to the entire working group for final review before it goes out to stakeholders.
2. CRS will also send to the working group a description of the distribution process and the stakeholder list. Working group members are being asked to review the stakeholder list and add people as needed.
3. Meredith will draft a cover note to be sent to the stakeholders for review by the working group.
4. Once finalized, the cover note and Best Practices document will be distributed to the stakeholder group for comment.

Meredith reiterated that just because the group has worked together to develop this Best Practices document does not obligate any tracking system to follow all of the recommendations.

Generator Registry Concept – Update

Ed updated the group on the Generator Registry concept, a central location where information about generator information is compiled and accessible by anyone wishing to verify this information. The main purpose of compiling generator information from different systems is to have a place where tracking system operators or users can look to ensure that a single generator is not registered in more than one tracking system. The purpose is to prevent two or more tracking systems from issuing a certificate for a single MWH of generation.

The list of generators registered with NEPOOL GIS, GATS, and with the WI PSC is available on the web in an excel format and is updated quarterly for GIS, monthly at PJM, and immediately after a change in Wisconsin.

CRS will move forward with developing the generator database, and populating it with this information that is publicly available. CRS will look into getting the generators registered in the NJ solar tracking system.

Transferring Certificates Between Tracking Systems – Document Review and Discussion

Discussion began with the premise that there is a need to develop protocols for transferring certificates between tracking systems. There was concern raised over email that some of the

issues in the Transferring Certificates paper are related to policy issues that have already been made by regulators and are not appropriate for this group to discuss. An overarching concern was that the development of “Best Practices” around some of these issues might imply the need for states/tracking system to conform to those Best Practices and change policies. It was reiterated by CRS staff that the NAAIB doesn’t have any authority over tracking systems, and is not seeking to change or otherwise overrule pre-existing policy decisions. The main focus of this agenda item is to clarify what the issues are with regards to transferring certificates between tracking systems, especially as they relate to systems that have yet to develop rules, and to strive towards some compatibility among tracking systems in North America. Individual tracking systems can decide whether or not to adopt any of the Best Practices. It was pointed out that there is a national voluntary market for renewables and that tracking systems serve a broader scope than just compliance markets. It was also acknowledged that serving the compliance market is the immediate interest and responsibility of those tracking system that are operational.

The group decided to go over each issue item in the document in order to determine whether it is a “mechanics” or a “policy” issue. The following issues were agreed to be related to “mechanics,” and therefore will be addressed by the group. The wording of the issue will be redrafted in the next version of the document.

Issue 1b: Should tracking systems have a way of distinguishing whether or not an import (or export) was accompanied by an energy delivery (if a non-energy import is allowed)?

Issue 4: Should the importing generating unit be required to register with the importing tracking system? The group determined that this issue should be reworded to incorporate two possible scenarios: 1) where a generator is part of a tracking system and importing certificates into another tracking system and 2) where a generator that is not currently in any tracking system but want to importing certificates into a tracking system.

Issue 6: Must the imported energy be accompanied by a NERC tag?

Issue 7: What source should be accepted for dynamic data and how should it be verified? There was particular interest in behind-the-meter and very small systems.

Issue 8: What provision should be made to avoid double counting (specifically with regard to imports)? This issue was largely addressed in the Double Counting document, so will not be discussed necessarily, but the recommendations will be included in the Transferring Certificates document.

Issue 10: Other Import/Export Issues Not Addressed BY GIS or GATS- All of the following issues were deemed to be “mechanics” issues.

- What is the basic mechanism for transferring certificates between tracking systems, from a tracking system operators’ perspective? e.g., are certificates “retired” from one system and re-issued in the new system, or are certificates simply transferred and all data remains intact?
- At a technical level, how will an exporting tracking system notify the importing tracking system of a pending transfer, and how will the communication proceed?

- What is the technical format and procedure for transferring the data?
- How is the transfer noted on the certificate, e.g. is there any way to tell that certificate originated in another tracking system, or is it simply issued “new” in the importing system such that its origin is hidden?
- What happens when the importing and exporting tracking systems do not track the same data fields? Are the empty fields populated or do they remain empty? Conversely, is information lost when the certificate is transferred to a tracking system that doesn’t track as much information? If the certificate is re-imported can the lost information be recovered?
- How are certificate serial numbers handled when a certificate is transferred across tracking systems.

All other numbered issues (1a, 2, 3, 5, and 9) were determined by the group to be policy issues and were struck from the list for future discussion.

CRS staff will redraft this Certificate Transfer document in preparation for the next meeting.

Announcements about Upcoming Meetings:

The minutes for this meeting will go out shortly for the group’s review. Aleka will also send out an email (via meeting wizard) to determine availability for the next three meetings.