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UTILITIES COMMISSION

October 1, 2007

VIA COURIER AND U.S. MAIL

Dr. Burl W. Haar
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**RE: In the Matter of a Commission Investigation
Into a Multi-state Tracking and Trading
System for Renewable Energy Credits**

Docket No. E-999/CI-04-1616

**In the Matter of Detailing Criteria and Standards
For Measuring an Electric Utility's Good Faith
Efforts in Meeting the Renewable Energy Objectives
Under Minn. Stat. 216B.1691**

Docket No. E-999/CI-03-869

Dear Dr. Haar,

Attached please find the Initial Comments of Wind on the Wires in the above referenced dockets regarding the questions posed by the Commission on protocols for a program for tradable renewable energy credits for electricity generated by eligible energy technology as defined by Minnesota Statutes 2007, Chapter 216B.1691.

Paper copies of the comments have been mailed to all other parties on the Service Lists in the above referenced dockets.

Sincerely,



Beth Soholt
Director

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COMMENTS OF WIND ON THE WIRES

Pursuant to the Commission's August 31, 2007 Notice in this docket, Wind on the Wires ("WOW") offers the following comments on issues related to implementation of the Midwest Renewable Energy Tracking System ("M-RETS"). Although WOW has provided our initial perspective on each question posed by the Commission, we understand that the implementation of M-RETS is likely to be a fluid process and that the Commission and stakeholders may have to revisit these issues periodically as utilities meet their Renewable Energy Objectives and Renewable Energy Standards. We look forward to a productive dialogue with the Commission and other stakeholders.

Should Any Functions Be Added to MRETS so that RECs from the MRETS tracking system comply with the requirements of Minnesota Statutes 2007, Chapter 216B.1691, subd. 4?

No. We understand that the M-RETS system has been developed through an open stakeholder process facilitated by renewable energy credit (REC) experts at the Center for Resource Solutions. We

also understand that M-RETS has been designed with very similar functionality to other regional REC tracking systems such as WREGIS (the Western Renewable Energy Generation Information System). Based on this, we believe that M-RETS already has the functions necessary to support a robust REC market in the Midwest, including the capability to characterize each registered REC to ensure that buyers and sellers know they comply with the requirements of Minnesota's Renewable Energy Standard law. M-RETS will also be able to provide regulators the information they need to verify utility compliance with the standard.

Are there additional standards that the Commission must apply so that M-RETS certificates can be retired for compliance with the Minnesota REO/RES?

At this point, we do not see any additional functionality needed so that M-RETS RECs can be used for REO/RES compliance.

M-RETS does not define the expiration date for its certificates. What expiration date should be established for certificates used for compliance with the Minnesota REO/RES? What reasoning supports this recommendation?

The Commission has discretion to set the parameters on "vintage" for RECs used for compliance with the Minnesota REO/RES. We prefer not to use the term "expiration date" as RECs not used for REO/RES compliance, may still be valuable in another market. The Commission should strike a balance between 1) providing compliance flexibility and 2) encouraging the steady development of new renewable generation resources. We suggest a "three-year life" window for RECs used for REO/RES

compliance, including the year in which a REC is generated plus two subsequent years. By this we mean that for compliance in year X, a utility can use RECs generated in year X, year X-1, and year X-2. This provides an efficient, flexible compliance framework from year to year which supports a fluid market and accommodates weather-driven electric generation that may vary from year to year. WOW believes that the “three-year life” limitation also functions as a way to allow some banking of RECs by utilities for use in later years.

Some states’ tradable credit programs allow certificate owners to “bank” certificates for a period of time. Should certificate owners under the Minnesota program be allowed to bank certificates? If so, under what terms should banking of certificates be allowed?

Certificate owners should be able to bank and withdraw RECs for compliance or sale as a way to provide regulatory flexibility and smooth out year-to-year changes in renewable generation. The ability to bank goes hand in hand with providing multi-year-vintage RECs. In the interest of meeting the purposes of Minnesota’s RES statute in an efficient manner, the Commission should authorize banking within the restrictions of an established three-year vintage period for RECs. If the Commission chooses to consider banking beyond the “three-year life” proposal, we suggest that banking for longer periods only be allowed for renewable resources that a utility owns or has under a long-term contract of ten or more years.

How should the Commission determine the eligibility for meeting compliance with the REO/RES in Minnesota certificates issued by tracking systems outside of M-RETS? Should the Commission accept

certificates imported into M-RETS and converted to M-RETS certificates? If so, under what terms should this be allowed?

At this time, WOW believes the MN PUC should require that all RECs used for REO/RES compliance be tracked through M-RETS. If there is currently an appropriate way to import or convert RECs into M-RETS, the Commission should consider this. Use of M-RETS is the best way to ensure that there is no double counting of RECs. Over time, we believe that additional states will join M-RETS and this will allow MN utilities even greater location flexibility in acquiring renewable resources for compliance. Ultimately, M-RETS and other regional REC tracking systems will establish best practices for importing and exporting RECs, which will improve a national market for RECs. This will also likely encourage wind development in Minnesota beyond what is required by the MN REO/RES.

No disaggregated¹ RECs should qualify for REO/RES compliance at this time. It is our understanding that M-RETS will only track “whole” RECs, which supports our suggested policy direction. We do suggest that the MN PUC strongly encourage M-RETS to require a clear statement in all their contracts that participants will buy and sell only whole RECs. This will help insure that participants follow the M-RETS policy directive.

If, in the future, the market for environmental benefits from renewable generation matures to the point where we have clear policies regarding how attributes can be sold separately, disaggregation might be considered. If such a move is made, we suggest that M-RETS coordinate with its neighboring tracking systems to make sure they are using consistent protocols for tracking such disaggregated RECs.

¹ The term “disaggregated” is often used for RECs where some of the environmental benefits (such as NOx or SOx benefits) of the generated MWh are sold off to another party before the REC is sold into a compliance or voluntary market.

Should the Commission's policy (and the M-RETS standards) on import and export of certificates across tracking systems be made consistent with that of the North American Association of Issuing Bodies (NAAIB)?

Yes. It will improve the REC market and consumer and regulator confidence if M-RETS and all other regional tracking systems establish standards for importing and exporting of RECs that are consistent with those of the North American Association of Issuing Bodies (NAAIB).

The Commission has authority to impose a penalty for non-compliance in an amount not to exceed the lesser of the estimated cost of constructing complying facilities or purchasing credits. How should the Commission determine appropriate penalty levels?

The Commission should set penalties higher than the cost of complying by purchasing RECs, in order to deter non-compliance. The RES statute contains a number of compliance off ramps as well as authorizing the purchase of RECs. The Legislature has provided many mechanisms to facilitate compliance. Thus, the Commission should have the discretion to set penalties for non-compliance up to the limits authorized in law. It may be challenging to determine the cost of constructing facilities that would provide renewable energy for compliance, as well as accurate pricing of RECs. M-RETS is not designed to put out regular public reports on aggregate trading and pricing of RECs, however other organizations such as Evolution Markets do provide some information on regional REC prices. WOW suggests setting the penalty for non-compliance at the higher of \$50/MWh or 200% of the recent REC trading price. Until there is a strong REC market in the Midwest, should the Commission have to access a penalty, it may need to seek facts and evidence on the current cost of purchasing wind energy through a

Power Purchase Agreement or, in the case of utility ownership, of constructing a wind farm or purchasing a completed wind project from a wind developer. In any case, the Commission should not allow recovery of any penalty costs from a non-compliant utility's ratepayers.

What is required for the Commission to facilitate the trading of renewable energy credits between the states?

- Should the Commission encourage or require the use of the "bulletin board" function already provided by M-RETS for those interested in selling certificates to post offers?

WOW believes that an active "bulletin board" can help to facilitate a fluid REC market, and therefore the Commission should encourage the use of the M-RETS bulletin board. We do not feel that it is necessary to require the use of the bulletin board as some parties may find bilateral transactions outside such a forum serve their needs adequately.

- Should the Commission establish features beyond those that M-RETS already provides? If so, what features? For example, should this service be enhanced to allow buyers to submit "asks" and price information as well?

M-RETS appears to have all the features needed to track RECs for compliance with Minnesota law at this time. We are not aware of all the bulletin board functionality at this time, but we believe it may support "asks". If this functionality is not complete, the Commission should request strengthening of the bulletin board functionality to support the use of "asks" in order to improve the value of the bulletin board for REC buyers.

- Should the Commission go a step further and provide an “auction” type function that would allow bids and offers through a market clearing mechanism? If so, under what terms, who should provide this service, and how should it be funded?

WOW also does not find that an “auction” is necessary at this time.

- Should reporting requirements be established to allow the Commission to evaluate the transparency and effectiveness of a program to facilitate renewable energy credits trading?

The Commission should request a regular – perhaps annual or biennial - evaluation of M-RETS market performance as well as system accuracy to ensure that the market and the tracking system are functioning appropriately and are working consistently with Minnesota law. The Commission should also monitor audits and other regulatory reviews of REC markets.

- To maintain the integrity of a trading program, and for purposes of monitoring and potential investigations, should M-RETS track the transactions as well as the ownership of RECs?

No. Provided M-RETS fulfills the information requirements to ensure RECs retired by the state’s utilities are compliant with Minnesota law, the job of M-RETS is done. Other state and federal regulatory bodies may require tracking of transactions and may monitor REC transactions.

What other issues does the Commission need to address to carry out its responsibilities under Minnesota Statutes 2007, Chapter 216B.1691, Subd. 4?

The Commission has not asked about delivery requirements for energy associated with RECs, but WOW believes this is an area where the Commission will need to provide guidance because the legislation has not clarified delivery requirements. This is a policy issue that M-RETS is not specifically designed to facilitate, since the tracking system is not intended to capture any information about power contracts associated with REC sales. The Commission should consider the following questions when establishing a policy to give clear direction to utilities as well as developers on energy delivery requirements for REO/RES compliance.

- Location of the renewable resource? (Does the Commission want to allow resources outside of MN? Outside of neighboring states? Only from states that have renewable energy standards?)
- Should RECs and energy be bundled for delivery to utilities for REO/RES compliance, or are REC purchases alone (unbundled) adequate? Is there an appropriate balance of bundled and unbundled RECs for utility compliance? RECs bundled with energy encourage utilities to make long-term commitments to renewable resources which drive development of new facilities. Unbundled RECs allow a simple trading mechanism that can reduce the transaction costs of renewable energy, and facilitate a utility's end of the year balancing of accounts for compliance.

WOW takes no position on delivery requirements at this time. This issue will need some focused attention and discussion, and the Commission may want to revisit the requirements over time as electricity and REC markets change. WOW is interested in participating in stakeholder discussions as this topic is addressed.

Should some of the issues identified above be implemented immediately, while others are addressed as part of Phase II?

Rules governing the use of M-RETS to facilitate the tracking of RECs for compliance with Minnesota law should be adopted as a whole. To the extent the Commission finds a need to revise its implementing rules, it may do so in subsequent dockets. Adopting some rules now, while deferring decisions on other issues until later, would only cast doubt on the validity of individual RECs and thwart the development of a vibrant REC market.

Dated: October 1, 2007

Respectfully submitted,



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