Interim Guidance for Electric Power Entity Reporting

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Introduction

Washington State Department of Ecology (Ecology) has developed this interim guidance for Electric Power Entities (EPE) reporting greenhouse gas (GHG) emissions under WAC 173-441. Ecology is structuring this interim guidance in the format of Frequently Asked Questions (FAQs). This guidance does not have the force of law, does not establish new mandatory requirements for GHG reporting, and in no way supplants, replaces, or amends any of the legal requirements of the Rule. Conversely, an omission or truncation of regulatory requirements in this guidance does not relieve operators of their legal obligation to fully comply with all requirements of WAC 173-441.

Section 1.0: Specified and Unspecified Source Electrical Imports

This section describes the requirements for specified source imports, seller warranty, short-term transactions, Asset Controlling Suppliers (ACS), and ACS power.

Sec. 1.1: General Requirements for Reporting Specified Source Imports

The following FAQs address general questions for reporting specified source electrical imports under WAC 173-441, including what criteria must be met to claim imported power as from a specified source.

Sec. 1.1.1: What criteria must be met for imported electricity to be reported as from a specified source?

If imported electricity meets specified source requirements in WAC 173-441, it must be reported as such. To report imported power as from a specified source, an EPE must have a specified source power contract and the power must meet direct delivery requirements (generally through e-tag documentation). Specific reporting requirements on aggregation, seller warranty, and measurement are set forth in WAC 173-441-124(3)(a)(ii) and (iv).

Importers that directly deliver power meeting all specified source requirements may not "voluntarily" report the power as unspecified. This includes electricity conveyed to the importer as specified under seller warranty provisions, as well as when specified source electricity is imported by the generation providing entity (GPE). This is the case regardless of contracts that seek to convey greenhouse gas benefits of zero emission power to other counterparties.

Sec. 1.1.2: For imports made on behalf of a retail provider, does the retail provider need to report all of the details of the import (as if they were the importer)?

WAC 173-441-124(3)(d) requires retail providers that report any imports or exports to also report electricity imported on their behalf to serve their load and identify the importing first jurisdictional deliverers. In the EPE Reporting Tool, retail providers must report all of the details "on behalf of" imports (as if they were the importer), except that they would select "No" to the question "Are YOU the PSE on the NERC e-Tag in the Physical Path table on the last Washington border crossing, or meet the FJD definition?". This applies to both specified and unspecified imports, including electricity from Washington Renewables Portfolio Standard (RPS) eligible renewable energy resources.

Sec. 1.1.3: Can substitute power be provided by a specified source?

Yes. Substitute power can be provided by a specified source. However, it is generally the case that ancillary services for transmission are provided as unspecified power from within the host balancing authority area (BAA). An EPE must provide appropriate documentation, such as a specified source contract for substitute power (also referred to as ancillary services power), to the third-party verifier and Ecology to substantiate the specified source claim.

Sec. 1.1.4: Can a specified source include more than one facility?

In general, multiple power generation facilities cannot constitute a single specified source under WAC 173-441, except for ACSs which are approved and registered by Ecology. Under section WAC 173-441-124(2)(m), a specified source of electricity is a particular facility or unit that can be claimed as a delivered source of electricity. Thus, a reporting entity cannot register multiple units as a single facility or source, for purposes of obtaining a single specified source emission factor. However, multiple hydroelectric facilities operated under a single Federal Energy Regulatory Commission (FERC) license may be considered one facility.

Sec. 1.1.5: What is a GPE as it pertains to a specified source?

A generation providing entity (GPE) is a full or partial owner, generating unit operator, or party to a contract for a fixed percentage of the net generation from a specified source (see GPE definition in WAC 173-441-124(2)(e)). An entity that is entitled to a share of the total capacity or total output of a facility meets the GPE definition, whereas an entity that is entitled only a fixed MW or MWh amount does not.

Sec. 1.1.6: Does a GPE have to report power imported from a specified source (for which it is a GPE) as specified source power?

When the power is directly delivered, the importer "must report all direct delivery of electricity as from a specified source for facilities or units in which they are a GPE or have a written power

contract to procure electricity," per section WAC 173-441-124(3)(a)(iv). However, an e-Tag alone is not definitive, and the power contract must also be examined for consistency with regulatory requirements. Entities cannot voluntarily report specified source power as unspecified.

GPEs who import specified power must still conduct a lesser of analysis when required by section WAC 173-441-124(3)(b)(ii)(B)(VI) and must report electricity as unspecified, consistent with the "unspecified source" definition in section WAC 173-441-124(2)(n).

Sec. 1.1.7: What happens if there is a mismatch between the contracted source and the tag source?

The specified source of electricity definition requires that the electricity importer have the right of ownership or a written power contract, and the "direct delivered" definition requires that electricity be directly delivered to the Washington grid. Under WAC 173-441-124(2)(aa), the definition of "power contract" or "written power contract" for a specified source contract is contingent upon the delivery of power from a particular facility, unit, or asset-controlling supplier's system that is designated at the time the transaction is executed.

The "source of generation" or "generation source" is defined under WAC 173-441-124(2)(ff) as the generation source identified on the physical path of NERC e-Tags. Thus, the contract source must match the source on the physical path of the final delivered e-Tag. Mismatched sources, even if similar or equal in carbon content, are nonetheless mismatched and cannot be claimed as specified source power.

Transactions can only be claimed as specified source imported power if all applicable requirements are met. Power that cannot be claimed as specified must be reported as unspecified.

Sec. 1.2: Seller Warranty

The following FAQs address questions related to seller warranty requirements in WAC 173-441, including how the requirements are applied to specified source claims.

Sec. 1.2.1: What is the role of the seller warranty requirements in short-term transactions?

The seller warranty provisions in section WAC 173-441-124(3)(iv) are designed to enable EPEs to correctly identify and report specified power transactions and prevent the resale of unspecified power as specified source power. Transactions that meet the seller warranty requirements are eligible to be claimed as specified source imports, as long as all other requirements of WAC 173-441-124 are met. A reporter cannot report electricity as specified power for transactions that do not meet the seller warranty requirements.

Sec. 1.2.2: What is seller warranty, as it pertains to specified source claims?

Seller warranty is a power contract provision or guarantee in which the seller agrees to provide power from a specified source to a buyer, with a warranty that the power provided has not been previously transacted as unspecified power. Seller warranty provides for greater electricity market transparency and more accurate pricing when purchasing specified power.

Sec. 1.2.3: Is it possible to resell unspecified power as specified power?

While it is technically possible to resell unspecified power as specified source power, such a transaction would not meet the seller warranty requirements in WAC 173-441-124(3)(iv), and therefore, such power must not be reported as specified under WAC 173-441. If the power was reported as specified, and during the verification process it was determined to be unspecified, the specified power would need to be reclassified as an unspecified source transaction, which could result in an increase in covered emissions for the reporter.

Sec. 1.3: Short-Term Transactions

The following FAQs address questions related to short-term transactions of electric power, including how the specified source requirements and seller warranty provisions of WAC 173-441-124 apply to short-term transactions for electric power.

Sec. 1.3.1: What are short-term and long-term transactions for electric power?

Under most power contract agreements, often referred to as enabling agreements, short-term transactions are transactions for less than one week in duration, for which written confirmations are not required between buyer and seller, and long-term transactions are for transactions for one week or more in duration. Short-term transactions are typically for day-ahead or real-time power. Unlike short-term transactions, long-term transactions generally require the use of written confirmations in order to incorporate any verbal agreements into the terms of the underlying written contract.[1]

Sec. 1.3.2: Are there any standard contracts that could be used to facilitate short-term transactions that would meet Ecology specified source requirements?

Most short-term power trading is conducted under the umbrella of one of the standard power contract enabling agreements, e.g., the Western Systems Power Pool (WSPP), Edison Electric Institute (EEI), or International Swaps and Derivatives Association (ISDA). If operating under a standard agreement, power traders are bound by the standard provisions of the written

[1] The WSPP standard contract agreements are available here: https://www.wspp.org/pages/Agreement.aspx

agreements which allow them to verbally agree on the terms of the specific transaction. Short-term power markets have evolved to allow for a high level of transaction precision and efficiency for the standard confirmation provisions, including price, quantity, and delivery point, which can be easily confirmed verbally.[2] Additionally, to facilitate reporting and verification under greenhouse gas reporting programs, WSPP members approved an optional specified source confirmation in December 2013, referred to as Exhibit C-SS, which can be utilized in both short-term and long-term transactions.

Sec. 1.3.3: How will a verifier and Ecology determine whether a short-term transaction is from a specified source?

Short-term power transactions can be verbally transacted via phone if provided for in the underlying written contract. Although an entire short-term transaction can be accomplished via voice record, both buyer and seller may have very different opinions about what product was actually transacted, e.g., whether specified or unspecified power was transacted. Thus, not all short-term transactions may result in an explicit acknowledgement between buyer and seller of the type of power transacted. In this scenario, an EPE may use the voice tape to indicate that the buyer and seller agreed to a specified source product prior to execution of the transaction, and thereby establish evidence of seller warranty, which can then be used as evidence during the verification process.

A specified source claim must include (1) a written contract, (2) direct delivery, and (3) a specified source seller warranty throughout the market path.

- Contract requirement: A reporter claiming transacted electricity as specified needs to show evidence of a written contract, which can include one of the standard enabling agreements.
- Direct delivery requirement: A reporter claiming transacted electricity as specified needs to demonstrate direct delivery, likely by providing the standard e-Tag documentation, which is the most common, or by demonstrating another form of direct delivery per WAC 173-441-124(2)(k).
- Seller warranty requirement: A reporter claiming the transacted electricity as specified needs to provide evidence that a specified power purchase seller warranty was provided at the time the transaction was executed. Reporters may refer to Table 1 for guidance on situations in which this requirement may be satisfied. The examples in Table 1 are not exclusive.

[2] Under standard enabling agreements, verbal can mean both verbal and electronic.

Table 1: Seller Warranty Guidance for Short-Term Transactions

Did Reporter Establish Evidence of Seller Warranty?	
Yes. At a minimum, voice tape indicates buyer agreed to buy specified power and seller warranted that it would provide specified power. Supplemental documentation, such as trade logs and/or aggregate daily, weekly, or monthly confirmations can strengthen the claim.	**Specified Source Claim**
No, if: Voice tape indicates buyer agreed to buy unspecified power. -or- Voice tape has no indication buyer agreed to transact specified source power, including ACS power, prior to execution. -or- Buyer cannot demonstrate that the source was specified prior to contract transaction execution. -or- Voice tape has no indication that the seller warranted that it would provide specified power.	**Must be Claimed as Unspecified**

Note: This table assumes valid contract rights, and direct delivery with appropriate source information. See Table 2 for BPA transactions.

Sec. 1.3.4: What happens if a reported specified source claim is found to be invalid during the WAC 173-441 verification process?

In the event a reported specified source claim is found to be invalid during the verification process, the reporter would be required to reclassify the transaction as unspecified in the GHG emissions data report. This could result in an increase of covered emissions for the first jurisdictional deliverer (importer).

Please see Section 1.1 of this document for more information on the types of evidence that may be submitted during the verification process to substantiate specified source claims.

Sec. 1.4: Asset Controlling Supplier Requirements

The following FAQs are related to asset controlling suppliers (ACS), including requirements that must be met to be approved as an ACS, which entities are approved as an ACS under WAC 173-441-124, and how the specified source requirements and seller warranty provisions apply to ACS power.

Sec. 1.4.1: What is an ACS?

An ACS is a specific type of EPE approved and registered by Ecology. An ACS owns or operates interconnected electricity generating facilities or serves as an exclusive marketer for these facilities even though it does not own them. Each ACS is assigned a system emission factor by Ecology for the wholesale electricity procured from its system and imported into Washington. ACS emission factors are published on a two-year lag; e.g., 2020 emissions data is reported and verified in 2021 and then published in 2021 for use in 2022 transactions. Once approved by Ecology, ACS power procured from an ACS's system is considered specified source power, subject to meeting all applicable requirements.

Sec. 1.4.2: What is the process for an entity to be approved as an ACS?

WAC 173-441-124-(3)(f) includes provisions for an EPE to apply to become an ACS. By May 1, EPEs seeking an ACS designation should submit an ACS application to Ecology. By June 1, the EPE must file a system emission factor calculation using the Ecology developed ACS Reporting Tool.

After the system emission factor calculation has been third-party verified and Ecology has approved the EPE as an ACS, Ecology will post an ACS system emission factor for use during the following calendar year.

Sec. 1.4.3: Which entities are approved as an ACS under WAC 173-441?

For emission year 2022 transactions, Bonneville Power Administration (BPA) is an approved ACS entity. Please see the Emissions Reporting Website for more information on the Ecology approved ACS: [Emissions reporting - Washington State Department of Ecology]

Sec. 1.4.4: What evidence does an importer need to provide for Ecology to recognize a short-term purchase from BPA as specified source ACS power with the BPA ACS emission factor?

Reporters can use the BPA ACS emission factor for electricity imported from BPA, if the reporter can meet the seller warranty requirements for short-term transactions. Reporters can use Table 2 to determine if they meet the seller warranty requirements and have sufficient evidence to claim the BPA ACS emission factor for short-term transactions.

Table 2: Seller Warranty Guidance Short-Term Transactions for BPA Power, Buyer Purchase Scenarios

	Transacted Directly with BPA	**Transacted with Intermediate Seller**	**Unspecified Power Via Exchange or Broker***
Specified Source Claim at the BPA ACS emission rate	Regardless of contracted amount, tags that show source as "BPA Power" or "BPA Slice" and were transacted directly with BPA must be claimed as specified	See Table 1 guidance for seller warranty	A specified source claim is not allowed, because the transacted power was by definition unspecified, as the source was unknown prior to contract execution
Must be Claimed as Unspecified	Path out power (see Sec. 1.4.5) received from BPA via e-Tag (does not list BPA Power" or "BPA Slice" as source on e-Tag) must be claimed as unspecified	See Table 1 guidance for seller warranty	Must be claimed as unspecified, because buyer did not know source prior to contract execution

*Power can be transacted via broker as specified. Regulations and guidance in no way prohibit brokered specified source sales, so long as all applicable specified source requirements are met.

Note: This table assumes valid contract rights and direct delivery with appropriate source information.

Sec. 1.4.5: How to report BPA power as an ACS?

BPA only sells power from one source – its overall system portfolio. According to BPA, under its federal mandate, it cannot sell power from individual specified sources, nor can it self-market unspecified power. Although Bonneville considers all of its sales as sourced from the BPA system, Ecology differentiates between Bonneville sales from two sources based on e-Tags: BPA ACS power and path out power.

A path-out refers to a specific scenario where BPA purchases power in advance for use in serving BPA's expected needs but then BPA later discovers the power is not needed and resells that power; the buyer takes physical delivery of the power from BPA at the scheduling point (POR/POD). This type of arrangement has traditionally been used by many utilities, including BPA, but in a GHG accounting context is unique to BPA's system portfolio sales. For BPA, when the path-out power is scheduled it never sinks to BPA's system. Rather, the e-tag identifies the source as the generator/merchant BPA purchased from and the power sinks with the load

serving entity. While the power may be wheeled through BPA's system, it does not sink in our system. Accordingly, path-outs should not be part of the ACS emission factor.

Bonneville tags power from either BPA Power or BPA Slice (both of which are ACS power), or from non-BPA power sources (that were originally procured for use by the BPA system). Bonneville sales tagged from a non-BPA source but sold by Bonneville as BPA power are referred to as path outs, or path out power.

Thus, buyers of BPA power may end up receiving e-Tags sourced as BPA Power, BPA Slice, or as path out power. Transactions tagged as BPA path out power, where BPA is the seller, but the source is not the BPA ACS system, are not eligible to be claimed as specified source power, and therefore may not use the ACS emission factor for BPA.

A specified source contract is also required to claim ACS power, including from BPA. In contrast, path out power tags received as part of a BPA purchase must be claimed as unspecified. Entities that transact directly with BPA must claim specified ACS power when tagged with the source as either "BPA Power" or "BPA Slice."

Sec. 1.4.6: What power purchases made by an ACS will be included in its system emission factor calculation, and will thus be considered part of its ACS system footprint?

The ACS system emission factor calculation includes components for purchased electricity from specified and unspecified sources. Power purchases that sink to serve load or to maintain reliability of the ACSs system are included in the system emission factor calculation. Purchases intended to serve load or maintain system reliability that were sold as path outs will not be included in the system emission factor calculation.

Sec. 1.4.7: When buying BPA Slice power, what documentation should be made available to a verifier to meet the seller warranty requirements?

For short-term and long-term transactions, EPEs must comply with the specified source requirements in WAC 173-441-124. In general, the importer must establish evidence of seller warranty for the transaction, meaning that the seller has specified source rights to the BPA Slice power. For instance, for a transaction between an entity that has specified source rights to BPA Slice power and an entity that imports the power to Washington, evidence of seller warranty can be established through the following:

1. A confirmation between the BPA Slice holder and the importer. For long-term transactions, the reporter could provide a written confirmation between the BPA Slice holder and counterparty for each trade, denoting a sale of specified source power sourced as BPA Slice. For short-term transactions, reporters should refer to Section 1.3.3 of document.
2. A contract between the BPA Slice holder and BPA, exchanged initially between counterparties.

Sec. 1.4.8: Would a transaction using the WSPP contract (Schedule C) qualify as having a contract for specific source or ACS imports?

Yes. A transaction using the WSPP contract (Schedule C) qualifies as having a contract for specified source or ACS imports. Acceptable forms of a specified contract may include, but are not limited to, modified versions of either the WSPP Agreement Schedule B (Unit Commitment Service) or Schedule C (Firm Capacity/Energy Sale or Exchange Service) that specify the power is from the ACS system. Other contract forms that specify the source (e.g., a particular facility, unit, or ACS system) at the time of entry into the contract are also acceptable. A contract for a source of electricity that is not a specified source at the time of entry into the transaction to procure the electricity is unacceptable for the purposes of reporting a specified import.

Ecology posts the ACS emission factor at GHG emissions reporting - Ecology

Section 2.0: Meter Data Requirements and Lesser of Analysis

This section describes the meter data requirement in WAC 173-441-124(3). This section also describes the applicability and implementation of the lesser of analysis.

Sec. 2.1: Overview of the Meter Data Requirement

The following FAQs address questions related to the meter data requirements of WAC 173-441-124(3)(b)(ii)(B)(V), including what data must be retained and the types of specified source imports for which EPEs must retain meter data.

Sec. 2.1.1: What is meter generation data referred to in WAC 173-441-124?

Meter generation data, referred to in WAC 173-441-124(3)(b)(ii)(B)(V), is the measured volume of electrical energy in megawatt-hours (MWh) produced by the specified source that is made available for movement on the transmission grid. An electric meter is a device that measures the amount of electrical energy as meter data produced by a commercial power plant. Some power plants have two meters per generation unit, one on the low-side at the busbar and one on the high-side, while others may only have one. The low- and high-side refer to the voltage level of the electric power as it passes from the generator to the transmission grid.

Sec. 2.1.2: Does Ecology require reporting entities to submit actual meter data to comply with WAC 173-441-124?

Power plant owners or operators may not be able to provide actual generation meter data to reporting entities in the form of a direct data connection to an actual power plant meter or data fields and information produced by an actual power plant meter for a given time interval. If plant operators or owners are not able to provide actual meter data to the reporting entity,

the reporting entity may use a spreadsheet representation of the meter data to comply with meter data requirements, along with evidence that the meter data was provided by the power plant owner or operator. Verifiers must have reasonable assurance that the meter data provided are an objective representation of the actual measured electricity production.

Sec. 2.1.3: Do reporting entities have to retain meter generation data for all specified source imports?

Reporting entities do not have to retain meter generation data for all specified source imports. Reporting entities must only retain meter generation data for those imports for which a lesser of analysis is required, as described in Section 2.2 of this document.

Sec. 2.1.4: How do reporting entities obtain meter information from a third party for a specified source?

The process of obtaining meter data is an industry practice not addressed by WAC 173-441-124. However, Ecology recommends that a reporting entity contracting for renewable power from an eligible renewable energy resource for import to Washington make a request for meter data as a provision of the power contract to ensure delivery of the contracted product.

Sec. 2.1.5: Is the meter data requirement applicable to specified source market purchases of imported electricity by power marketers?

Yes. Market purchases of specified source imported electricity (i.e., hourly, daily, or quarterly) by power marketers, including purchases from out-of-state hydro resources, are subject to the meter data requirements. Therefore, the lesser of analysis is also applicable to these types of transactions.

Sec. 2.2: Lesser of Analysis

The following FAQs address questions related to the lesser of analysis, including a description of the lesser of analysis and why it is required, the types of specified source imports for which an EPE must conduct the lesser of analysis, and how an EPE conducts the lesser of analysis for required imports.

Sec. 2.2.1: What is a lesser of analysis and how do reporting entities use meter generation data to conduct the analysis?

Reporting entities must conduct a lesser of analysis to determine the amount of generated and scheduled power that can be reported as specified source power. Using this analysis, reporting entities will determine the amount of power that can be reported as specified if there is a

difference between the amount of electricity generated within an hour and the amount of electricity scheduled or metered into a Washington balancing authority within that same hour.

When the imported power is documented via e-Tag, the reporting entity must compare imported power as documented on the e-Tag to the actual meter generation data on an hourly basis. Reporting entities must only report the lesser of the two amounts as directly delivered specified source power. Additionally, when imported power documented on the e-Tag is greater than the amount of power generated by the plant in that hour, the reporting entity must report the difference as an unspecified import(s).

Both Specified and Unspecified Import line items subject to the Lesser of Analysis should continue to be reported as "Tagged" if transacted with e-Tag. Only imports whose delivery is directly metered and not transacted with e-Tag should be reported as "Metered".

Sec. 2.2.2: Why is a "lesser of" analysis required?

For GHG reporting purposes, WAC 173-441-124(3)(a)(ii) requires reporting entities to distinguish between specified and unspecified power imports. When power is delivered via e-Tag from an out-of-state generation resource to a sink point in Washington, direct delivery occurs in hourly increments. Direct delivery of electricity is defined as three types of power:

- the facility has a first point of interconnection at a Washington scheduling point or within a power system;
- the electricity is scheduled for delivery from the specified source to a Washington scheduling point or a power system via a continuous physical transmission path from interconnection of the facility in the balancing authority in which the facility is located to the Washington scheduling point or power system;
- or there is an agreement to dynamically transfer electricity from the facility to a Washington scheduling point or power system.

When hourly meter generation output (MWh) from a generation resource falls below scheduled hourly transmission levels, it is standard industry practice for ancillary services or other power sources to make up the difference. In this instance, ancillary services or other power sources are substitute power under WAC 173-441-124. In order to comply with these provisions, a lesser of analysis must be used when required to determine that portion of electricity attributable to the specified source and that portion attributable to unspecified power.

Sec. 2.2.3: When are reporting entities required to conduct the lesser of analysis?

Reporting entities must conduct a lesser of analysis for imports from specified sources for which Ecology has calculated an emission factor of zero, and for imports from Washington renewable portfolio standard (RPS) eligible renewable energy resources.

Pursuant to WAC 173-441-124(3)(b)(ii)(B)(VI), reporting entities are not required to conduct a lesser of analysis for imports with: (1) dynamically tagged power deliveries, (2) nuclear power, (3) ACS power, and (4) imports from hydroelectric facilities for which an entity's share of metered output on an hourly basis is not established by power contract.

Please contact ghgreporting@ecy.wa.gov if you have a question about whether a lesser of analysis is required for a specific resource.

Sec. 2.2.4: Are importers of electricity from the Mid-Columbia Hydro Projects (Mid-C hydro) subject to the meter data requirement?

Electricity from Mid-C hydro are subject to the meter data requirements and they are required to conduct a lesser of analysis. Instead of meter generation data, entities that either own or have a contractual allocation of Mid-C hydro generation at one or more of five non-federal hydro projects receive allocated meter data reports that show what was received from each hydro project, based upon ownership or contract share. The allocated meter data represents actual output in the same way that meter generation data represents actual output of an individual facility.

Sec. 2.2.5: Can you provide an example of how to conduct a lesser-of analysis for purposes of complying with WAC 173-441?

Table 3 provides sample meter data that would be used in a lesser of analysis. Examples 1 and 2 provide meter data that represents under- and over-generation scenarios, respectively, from Source A.

Table 3: Meter Data Requirement During Under- and Over-Generation
Illustration for One Hour of Generation Scheduled and Delivered

Description	**Example 1** Under-Generation (MW or MWh)	**Example 2** Over-Generation (MW or MWh)
Metered Generation at Source A	85	115
Scheduled on e-Tag	100	100
Lesser of Meter or Scheduled	85	100
Zero Emission Specified Source Claim	85	100
Substitute Power	15	0

Example 1: Scheduled Power on e-Tag Exceeds Generation in the Hour.

Source A generates 85 megawatts (MW) in a given hour, but 100 MW is scheduled for that hour on a single NERC e-Tag. Because only 85 MW is generated and 100 MW is scheduled, an additional 15 MW must be obtained by the EPE to meet the scheduling requirement of the e-Tag. The additional 15 MW is provided by the Transmission Provider (TP) and consists of unspecified power. While 100 MW is directly delivered to Washington during that hour, the reporting entity can only claim 85 MW as zero emission power, and the entity must report the remaining 15 MW as unspecified power.

Example 2: Generated Power in the Hour Exceeds Scheduled Power on e-Tag.

Source A generates 115 MW in a given hour, but only 100 MW is scheduled for that hour on a single NERC e-Tag. The reporting entity must only report 100 MW as specified imported power to Washington The remaining 15 MW cannot be claimed as an import because it did not appear on the NERC e-Tag and was not delivered to Washington.

Sec. 2.2.6: What happens if you fail to conduct a lesser of analysis?

An EPE must conduct a lesser of analysis when applicable and must accurately report the associated specified and unspecified electricity in the GHG emissions data report. If a reporting entity does not report specified power as specified or does not conduct a lesser of analysis for required sources under WAC 173-441-124, the verification body would identify a nonconformance, resulting in a correctable error. If the error identified by the verification body is not corrected, it would result in an adverse verification statement.

Sec. 2.2.7: If, after conducting the lesser of analysis, I have substitute power how do I report this?

As discussed in Section 2.2.2 of this document, if the amount of scheduled power exceeds the actual power generated for the resource in a given hour, that excess would be considered substitute power and reporting entities would report it as unspecified power. In the EPE Reporting Tool, reporting entities must report substitute electricity separately for each specified source.

Section 3.0: Reporting Retail Sales of Electricity

This section addresses reporting retail sales of electricity that serve Washington load.

Sec. 3.1: Do EPEs have to report retail sales that serve Washington load?

Yes, EPEs that are retail providers under the Washington greenhouse gas reporting program are required to report retail sales for each calendar year, even if they have zero retail sales to report. Additional requirements for retail providers are set forth in WAC 173-441-124(3)(c). Retail sales are reported in MWh.

Sec. 3.2: What constitutes “retail sales of electricity”?

“Retail sales” is defined in WAC 173-441-124(2)(dd) as “electricity sold to retail end users”. For investor-owned utilities (IOUs), this should include both bundled and unbundled retail sales. For purposes of reporting retail sales under the Washington greenhouse gas reporting program, the requirement is to report a single annual retail sales figure in MWh. In order to verify the accuracy of the reported figure, the entity must provide substantiating documentation to the verifier demonstrating the accuracy of the reported totals. In addition, IOUs shall calculate, report and cause to be verified, the name(s) and total Washington retail sales of each load-serving entity in its electrical distribution service territory. IOUs should not include the retail sales totals of any publicly owned electric utilities they serve. IOUs should document how those values were calculated, and make the documentation available to verifiers to support the accuracy of the reported totals during the verification process.

Section 4.0: Reporting Energy Imbalance Market Purchases

This section addresses reporting purchase of electricity from the Energy Imbalance Market.

Sec. 4.1: How should I report purchases of electricity from the Energy Imbalance Market?

The greenhouse gas reporting rules (WAC 173-441) were updated to allow for all categories of entities that participate in the Energy Imbalance Market (EIM) in Washington to be able to report on their purchases of electricity from this organized market. The data elements required for reporting on purchases of electricity from EIM will be provided by the California Integrated System Operator (ISO) directly to their participating entities who are electric power entities (EPEs) under the Washington greenhouse gas reporting rule. The data provided should represent the annual settlement data for EIM electricity purchased by the utility or EIM participating entity.

For BPA customers, the necessary information may be provided by BPA to their customer utilities. The data provided by California ISO and BPA should be transferred directly to the reporting tool in the Start Here tab. There should be no need for any further analysis. For additional information about California ISO and EIM, refer to WA WEIM GHG Enhancements.

Note that at this time there is not a need or an ability for EPEs that are selling into the Energy Imbalance Market to separately report EIM sales that are imported into Washington. It is anticipated that Washington will transition to a system where that reporting is required in the future, however, at this time those data do not exist and there is no EIM import reporting analogous to what occurs in California.