



Guidance on Wheeling Renewable Electricity into the State of New York from PJM-GATS

The Green-e Energy National Standard lists the requirements for wheeling renewable electricity from a neighboring state or region. Section VI.A.c states that providers of electricity products can source from:

“[a]n adjacent North American Reliability Corporation (NERC), Independent System Operator (ISO), Regional Transmission Organization (RTO), or Balancing Authority Area region where the electricity, bundled with the Renewable Energy Certificate (REC), is wheeled into the respective region of the customer being served.”

Based on the New York State Department of Public Service (DPS) rules on accounting for renewable electricity imports, this requirement can be met without specifically scheduling electricity delivery into New York, as long as net imports from PJM-GATS in NY are positive over the course of the year of certified renewable energy sale *and* greater than total imports requested by all Green-e Energy participants for Green-e Energy certified sales in that same calendar year.

In order to satisfy Green-e Energy’s electricity wheeling rules, Green-e Energy program participants must follow the procedures outlined below, which ensure that New York counts the electricity imported as being for the benefit of the Green-e Energy participant and its customers, rather than counting it toward New York’s renewable energy disclosures and mandates.

These rules are only applicable to PJM-GATS imports into the State of New York, and not necessarily applicable to wheeling electricity to or from any other states or regions.

The following steps must be followed to demonstrate “wheeling” of renewable electricity into New York from PJM:

1. Purchase and Retire Renewable Energy Certificates (RECs).

- a. The Green-e Energy participant will generate or purchase the generation facility’s RECs in PJM -GATS, and then retire them.
 - i. To demonstrate retirement, the participant will indicate in the GATS retirement report that that the RECs were retired for an “Exported off-system to a third party in a region that does not have a compatible tracking system” sale. Enter the LSE customer’s name and “Green-e Energy RYXXXX” (where “XXXX” is the calendar year of certified sale) in the Purchaser memo field.

2. File Conversion Transaction(s) with the New York Department of Public Service.

The NY DPS must receive Conversion Transactions (CTs) to identify the RECs retired in PJM-GATS for the purpose of wheeling. One CT is required from the entity wheeling the electricity, and one CT from the NY Load Serving Entity (LSE) delivering the electricity to retail customers. See information on how to report CTs here:

<http://www3.dps.ny.gov/W/PSCWeb.nsf/0/280E6633FF4A527585257964004FA40E?OpenDocument>

- a. Importer / Wheeler: The Green-e Energy participant wheeling the electricity will need to file a CT with the NY DPS, in the form of PJM-GATS reports, showing all RECs that were retired for the participant or the participant's NY LSE customer.
- b. Retail LSE: The LSE delivering these MWh to retail load in New York must file a CT with the DPS, to show the end of the chain of custody of the PJM RECs. This report will either be the Green-e Energy participant's second CT filing (if the participant is also the LSE), or if the participant sells these PJM RECs to an LSE then this LSE must file a CT with the DPS. The LSE will be able to claim that they have imported renewable electricity from PJM from the specific facility that generated the REC.
- c. CTs and all other documentation must be submitted to the DPS before the Green-e Energy verification submission deadline for the year of certified sale in which the wheeled electricity is used. Check with DPS each year for the specific deadline.

3. Report to Green-e Energy During Annual Verification.

- a. The Green-e Energy participant must submit the CTs that the participant files with the DPS to Green-e Energy with the participant's annual Green-e Energy verification submission for the calendar year in which the imported renewable electricity was used in a Green-e Energy certified sale. The participant should receive a confirmation of receipt email from the DPS, and should provide this confirmation to Green-e Energy with the original CT request documentation.
- b. The Green-e Energy participant must submit the related GATS retirement reports, and any other documents related to the transactions, to Green-e Energy.
- c. The participant must also follow up with the DPS to confirm that the CTs were successfully processed and that the voluntary MWh reported to the DPS were not counted toward NY's residual pool of Spot Market energy for environmental disclosure purposes, and provide confirmation to successful processing to Green-e Energy as well. (The DPS will only notify that participant if there is an error.)

Result: The DPS will match the RECs to electricity imports from PJM, which will be considered a bundled import from PJM into NY.

Maryland and Delaware Generation: When importing renewable electricity from a state in PJM participating in the Regional Greenhouse Gas Initiative (RGGI), like Maryland and Delaware, the participant will also need to report that purchased generation to the New York Department of Environmental Conservation (DEC) for RGGI allowance retirement. If the generation facility is not located in a RGGI state, the participant will not need to report generation to New York DEC for RGGI purposes (the participant still must report electricity imports to the DPS, however). See Appendix A.2 of the National Standard for details on RGGI.

Green-e Energy understands that New York is developing its own electronic attribute tracking system, called NYGATS. Once complete, Green-e Energy's electricity import requirements for New York may change.

Please contact the Green-e Energy or NY DPS staff with any questions about their respective programs.

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