



Class I REC Reconciliation and True-up Guidelines

Overview:

The Massachusetts Class I Renewable Energy Certificates (RPS Class I REC) Program is a voluntary incentive program administered by the Department of Energy Resources (DOER). MassCEC PTS supports the program by serving as one of a group of qualified Independent Verifiers (IVs). To maintain program eligibility, systems registered with MassCEC PTS as the IV must maintain monthly production reporting to the Production Tracking System (PTS).

Failure to report metered data during the reporting period may result in the forfeiture of RPS Class I RECs that would have otherwise been generated during the unreported period. The Reconciliation and True-up guidelines below outline the process and eligibility criteria for requesting reconciliation of production not reported to the PTS on time for the MA Class I minting period.

Submitting a Reconciliation Request:

Only GIS Account Holders may submit reconciliation requests for review. These can be submitted by e-mailing pts@masscec.com with the information below:

- PTS System ID
- Month and Quarter missing production data
- Production requested for the true-up by calendar quarter in kWh
- Detailed summary of the reporting issue (generic or incomplete information will not be accepted):
 - When the issue started and when it first became known
 - Description of what caused the issue
 - Summary of attempts made to resolve the issue
- Reporting issue resolution status, including expected timeline to resolve if still in progress
- Any supporting documentation regarding the issue

MassCEC PTS will review submitted requests and either respond to gather more information or make an eligibility decision.

Requirements for Reconciliation Requests:

To be considered for approval of a Reconciliation Request, the following criteria must be met:

- MassCEC PTS must be given reasonable notice upon discovery of the reporting issue that prevents the system from reporting production.
- The request must be submitted prior to the deadline specified in the “Submission Deadlines” section below, based on the applicable production quarter.
- Requests must demonstrate that all efforts were made to resolve the issue prior to the standard quarterly minting period.
- Monthly production reporting is required for program compliance. Therefore, monthly reporting must resume for a reconciliation request to be processed. **Approved true-ups will be reflected in the next quarterly minting period, subject to the defined Submission Deadlines.**
- Reconciliation requests must be related to production in the current compliance year. Once the compliance year has closed, RECs for that period are unlikely to be issued.
- If production data is not available from the designated program-approved meter, it must be provided from a reliable and auditable secondary source. Estimated production data will not be accepted.

Submission Deadlines

Reconciliation requests must be submitted to PTS by the following deadlines to ensure timely review, approval, and processing within the approved quarter:

SREC/MA Class I Minting Quarter	Reconciliation Request Deadline
Q1 (Jan-Mar)	September 1 st
Q2 (Apr-Jun)	December 1 st
Q3 (Jul-Sep)	March 1 st
Q4 (Oct-Dec)	June 1 st

Eligible Causes

Provided they meet all requirements and are not deemed by MassCEC PTS to have a materially detrimental effect on DOER's Renewable Energy Portfolio Standards for a given compliance year (see 225 CMR 14.00), the following types of issues will be considered eligible for Reconciliation Requests:

- Equipment hardware malfunctions, such as a meter that has stopped recording production
- Acts of God (i.e., an accident or other natural event that could not have been prevented by reasonable foresight or care, such as a lightning strike)
- Internet or cellular service connection issues must be no more than six months, two full production quarters.
- DAS Provider subscription lapses must be no more than six months, two full production quarters.
- Software configuration issues must be no more than six months, two full production quarters.

Significant reconciliations (>100 MW) in a single quarter are reviewed by the Program Manager/Director.

Non-Eligible Causes

Causes of missed production reporting that would not be considered eligible for reconciliation include, but are not limited to:

- Untimely notifications to MassCEC PTS staff and DOER of ownership transfers or production meter replacement (see here for guidance re: ownership transfers - <https://masscec-pts.zendesk.com/hc/en-us/articles/13495785660187-Change-Request-System-Owner>)
- Negligence of Manual Reporting responsibilities (25kW DC and under only)
- Production readings that fail MassCEC Production Validation checks and cannot be resolved.
- Reconciliation requests submitted for the same compliance year for the same cause (not including equipment hardware malfunctions or Acts of God as defined above).
- Disruptions with indeterminate causes.

Reconciliation requests that are based on unique, extenuating circumstances will be reviewed by the Program Manager/Director and approved or denied on a case-by-case basis. Cases in dispute with the Program Manager/Director's decisions will be reviewed by DOER to assist with all dispute resolutions.