

## **EXHIBIT A**

### **Generating, Monitoring and Verifying Proposal**

DriveGreen proposes that the verification of the very low carbon intensity power generation eligible for LCFS credits would utilize the existing monitoring and verification process currently in place for renewable power. The Western Renewable Energy Generation Information System (WREGIS) is the independent, renewable energy tracking system for the region covered by the Western Electricity Coordinating Council (WECC). WECC has been approved by the Federal Energy Regulatory Commission (FERC) as the regional entity for the Western Interconnection and covers the 14 western states on the US mainland, 2 western provinces of Canada, and northern Baja Mexico.

Here is the overview of WREGIS tracking capabilities from the WREGIS website:

*WREGIS tracks renewable energy generation from units that register in the system by using verifiable data and creating renewable energy certificates (RECs) for this generation. This "accounting system" is designed to issue, register, and track RECs for use in verification of compliance with state and provincial regulatory programs (for example, Renewable Portfolio Standards), and voluntary market programs.*

*WREGIS tracks the Renewable and Environmental Attributes associated with renewable energy that are unbundled from the megawatt-hour and recorded on to a WREGIS Certificate. One certificate is created for each megawatt-hour of renewable energy produced, and each WREGIS Certificate is assigned a unique serial number. These WREGIS Certificates can be used by electricity suppliers and other energy market participants to comply with relevant state/provincial policies and regulatory programs, and to support voluntary "green" electricity markets. The data collected by WREGIS includes meter information from Qualified Reporting Entities, and static information regarding the generating unit that has been inputted by the Account Holder and verified by the WREGIS Administrator. WREGIS account holders can manage their individual REC portfolios in one account, and the same account will have numerous available sub-accounts into which the portfolios can be organized.<sup>1</sup>*

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<sup>1</sup> <https://www.wecc.biz/WREGIS/Pages/Join-WREGIS.aspx> (last reviewed January 12, 2017).

Overview of the Existing Credit Generation and Compliance Tracking System for the Renewable Portfolio Standard (RPS) in California (RPS Tracking System)

1. Before beginning production of Renewable Energy Credits (RECs), the facility- known as an electricity generating unit (EGU)- must be approved as an Eligible Renewable Resource (ERR) by the California Energy Commission (CEC)
2. The EGU must register with the Western Renewable Energy Generation Information System (WREGIS) as a Generating Unit
3. The EGU must utilize a revenue-quality meter that is WREGIS-approved to measure electricity the EGU delivers onto the grid
4. WREGIS determines the amount of renewable energy the EGU has placed on the grid based on revenue meter readings reported to WREGIS by a Qualified Reporting Entity such as a Balancing Authority
5. WREGIS places RECs in the EGU's account based on the amount of power the EGU supplied to the grid
6. Pursuant to contract, the EGU transfers RECs to the WREGIS account of the Electrical Distribution Utility (EDU) that must comply with RPS standards
7. Within its WREGIS account, the EDU retires RECs to meet its RPS compliance obligations
8. The EDU reports its compliance to the CEC
9. The CEC validates the EDU's RPS compliance reports by utilizing the CEC Program Administrator account in WREGIS to confirm that RECs have been retired

**Overview of the Proposed Compliance Process for Very Low CI Power to Generate LCFS Credits with reference to the RPS Tracking System**

1. The very low CI power generating facility (Facility) must fulfill Low Carbon Fuel Standard (LCFS) regulations pertaining to the establishment of a fuel pathway and receive pathway approval with a carbon intensity score for the Facility (CI) from the Executive Officer that is at least 60% lower than the California Grid Mix CI
2. The Facility must complete steps 1-5 of the RPS Tracking System for all RECs that it plans to transfer to qualified Electric Vehicle Service Providers (EVSP's)
3. The Facility transfers RECs to the WREGIS account of the EVSP that seeks to generate LCFS credits
4. The EVSP reports to ARB the amount of electricity that the EVSP has verifiably supplied to qualifying EV's (LCFS CAP)
5. Within its WREGIS account, the EVSP retires RECs not to exceed the LCFS CAP
6. The EVSP reports its RECs retired to ARB, and provides a corresponding LCFS credit generation report to ARB based on the amount of very low CI power the EVSP verifiably supplied to EV's, the CI of the Facility that generated the RECs, and the appropriate EV LCFS credit generation methodology
7. ARB validates the EVSP's LCFS credit generation report by utilizing the ARB Program Administrator account in WREGIS to confirm that RECs have been retired and do not exceed the LCFS CAP, and that the appropriate LCFS credit calculation methodology and CI score have been utilized.<sup>2</sup>

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<sup>2</sup> Alternatively, a third party verifier may be required to perform all or some portion of Step #7.