



MEMO

To: International REC Standard Foundation Secretariat
From: Stakeholders
Subject: Residual Mix Deadline Change

1. Introduction

The Residual Mix Deadline (RMD) has been May 15th since the start of the I-REC(E) Code and associated tracking system. This represented the last day that issuance from the previous year could be done within the regulations of the code. However, as the I-REC(E) system has grown, this deadline has resulted in a large number of Registrants requesting issuance in the weeks prior to the RMD leading, and a high workload peak for Issuers during these weeks. This peak in workload does not work well for Issuers, some of whom have had to increase staffing and training for a short portion of the year. As Issuers are reluctant to do so, this commonly results in work overloads, delays, and Registrants requesting exceptions. Combined with the COVID-19 pandemic, this resulted in an untenable situation for Issuers and the delay of the RMD in 2021 from May 15th to September 15th in 2021. In line with continued growth, a longer term, a more permanent solution needs to be finalized for Issuers and Registrants alike.

In an effort to address this need, the I-REC Standard secretariat sought stakeholder input on a rolling residual mix deadline, to be implemented starting in 2022.

2. Proposal of a Rolling Deadline for Stakeholder Feedback

Under the previous May 15th deadline, Registrants had 15.5 months to request issuance from production in January, whereas issuance relating to production from December had to be requested within 4.5 months. The rolling deadline aimed to shorten the periods during January – April and extend the periods during April – December by scattering the deadlines. The goal is to provide a more manageable work flow for all stakeholders. The proposed deadlines would be as follows:

Table 1: The suggested RMD for 2022 and beyond

Production Month Year X	Issuance Deadline Year X+1	Time to issue in months
January	March 31	14
February	April 15	13.5
March	April 30	13
April	May 15	12.5
May	May 31	12
June	June 15	11.5
July	June 30	11
August	July 15	10.5
September	July 31	10
October	August 15	9.5
November	August 31	9
December	September 15	8.5



3. Conclusion Following the Consultation

The secretariat proposed the above dates for the rolling residual mix deadline, and collected stakeholder feedback from November 4, 2021 to December 1, 2021. The consultation received feedback from a total of ten I-REC(E) Issuers and market players from countries such as Brazil, Columbia, Chile, Oman, Russia, and Turkey.

While the ideal outcome would have been greater turnout of Respondents, the diversity of Respondant's geographical location provided sufficient range of feedback. Respondents were generally supportive of having more than one deadline per year, but expressed a preference for two deadlines per year, as opposed to 12. Respondents identified end of May and September as the preferred deadlines. As such the new deadlines are proposed as follows:

Table 1: The RMD for 2022 and beyond

Production Month Year X	Issuance Deadline Year X+1
January – June	May 31
July - December	September 30

These deadlines have been reviewed with the respondents of the consultation form, the Issuers, the relevant Code Managers, and been approved by the I-REC Standard Foundation Board.