



730 Second Avenue South, #800
Minneapolis, MN 55402

GENERATION VARIANCE REQUEST

Electricity and Fuels Registries

Form ID: CleanCounts-Variance-Form Rev. 08-2026

Generation Variance Request Form

LAST MODIFIED AUGUST 12, 2026

This form must be completed and submitted when generation is reported more than 2 years but not more than 5 years prior to the generator's registration approval date (RAD) in a CleanCounts registry. Generation older than 5 years prior to the generator's RAD is not eligible for certificate issuance under any circumstance. Generators have 90 days from the Generator Approval date to upload historic generation without a variance. This form serves the CleanCounts Electricity Registry and the CleanCounts Fuels Registry. Complete the form and submit it to systemadmin@cleancounts.org with supporting documentation.

A Registry and requester identification

A1. Registry (required)

☐ Electricity ☐ Fuels

A2. Account Holder / Organization name (required)

A3. CleanCounts Generator ID (required)

A4. Generator name (required)

A5. EIA plant code (required for electricity generators over 1 MW)

A6. Is the Account Holder the Facility Owner? (required)

☐ Yes ☐ No

A7. Facility Owner name (required if A6 is No)

A8. Contact email (required)

B Generator history

Registration Approval Date is the date CleanCounts approved this generator's registration in the system. Commercial Operating Date is the date the generator first produced energy commercially.

B1. Registration Approval Date (RAD)
(required, MM/DD/YYYY)

B2. Commercial Operating Date (COD)
(required, MM/DD/YYYY)

B3. Repowering COD, if applicable (optional,
MM/DD/YYYY)

B4. Has the Facility Owner held this generator continuously since COD? (required)

☐ Yes ☐ No

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C Requested variance

C1. Vintage date range affected, From
(required, MM/DD/YYYY)C1. Vintage date range affected, To
(required, MM/DD/YYYY)C2. Number of certificates affected
(required)

C3. Statement of need (required)

Choose the option that best describes why this generation is being reported outside the normal window, then add the specifics below.

- ☐ **Late registration**
The generator began operating before it was registered with CleanCounts.
- ☐ **Correction**
This corrects an error in a previous filing or report.
- ☐ **Ownership change**
Ownership of the generator has changed since the generation occurred.
- ☐ **Program or registry backlog**
This generation predates when CleanCounts, or a program, began accepting this generator type.
- ☐ **New program eligibility**
The generator recently became eligible for a program or registry that did not previously apply.
- ☐ **Other**
None of the above describes this request.

Provide the specifics for this reason (required)

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D Regulatory intent

D1. Regulatory intent (required)

Do you intend for these certificates, or the underlying generation, to be used to satisfy any compliance obligation, for example RFS, LCFS, a state RPS, or a similar mandatory program?

☐ Yes ☐ No

Describe the steps you have taken to notify or seek approval from the relevant regulator or program administrator. (required, minimum 50 characters)

D2. How are you certain that this generation and the resulting certificates will not also be claimed under a regulatory obligation or program? (required, minimum 50 characters)

E Fuels and RTC volume attestation

☐ E1. 100% of this facility's production is being reported to CleanCounts, and only qualifying volumes are soliciting certificate issuance. (required)

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F

Attestations and signature

- ☐ F1. I attest that the environmental attributes or energy attribute certificates for the requested variance period have not been claimed or registered in another recognized tracking system. (required)
- ☐ F2. I attest that, prior to this request, this generation and its associated environmental attributes or energy attribute certificates, for the requested vintage period, have not been issued, sold, retired, or otherwise claimed by any party through any other registry, program, or transaction. (required)
- ☐ F3. Attestation letters from the Facility Owner and all other related parties are attached. (required if A6 is No)

F4. Signature (required)

SIGNATURE



Authorized representative of the Account Holder. Apply a digital signature using your PDF reader, or print and sign by hand

F5. Print name (required)

F6. Title (required)

F7. Date (required, MM/DD/YYYY)

RETURN COMPLETED FORM

Submit the completed form and all supporting documentation to systemadmin@cleancounts.org, or call (651) 900-7891 with questions. Requests reaching back more than 5 years (1,825 days) before RAD are not eligible for certificate issuance and cannot be approved by any exception process.