

Financial Services for Auctions and Reserve Sale

Request for Expression of Interest REI#: 2025-01

RESPONSE TO PROPOSER'S QUESTIONS: FEBRUARY 6, 2026

Interested parties are encouraged to visit the [WCI, Inc. website](#) for more information about our services, and to subscribe to the electronic mailing list.



Responses to Proposers' Questions

The purpose of the [Request for Expression of Interest \(REI # 2025-01\)](#) is to identify an experienced and qualified Contractor to develop and provide financial services administration ("Financial Services"), including all tasks detailed in the Attachment A: Statement of Work that are required to support WCI, Inc. Participating Jurisdictions Auctions and Reserve Sales (referred to as an "Auction" or "Auctions").

The intent of this document is to provide answers to Proposers' questions. In some cases, we reformulated questions and, where questions were similar, we combined multiple questions into one.

1. Is responding to this REI a prerequisite for participating in any subsequent RFP?

No, this is optional but recommended, as it might help to clarify both the Proposer's and WCI, Inc.'s understanding of the proposed customized solution required for Financial Services.

2. Who is the current Financial Services Administrator, and how do the existing services compare to those described in the REI?

Deutsche Bank National Trust Company is the current Financial Services Administrator. The services currently provided by Deutsche Bank National Trust Company are consistent with the requirements described in the REI.

3. Could a financial institution actively involved in the carbon credits trading of a WCI, Inc. participating Jurisdiction eventually be awarded a contract under this ongoing solicitation?

Yes. However, the selected Contractor and its agents, representatives, and subcontractors must mitigate conflicts of interest between the Financial Services required under the eventual Agreement with WCI, Inc., and the services provided by the Contractor to other clients or its other business operations.

Each Proposer must also disclose any potential real or perceived conflicts of interest (e.g., between the Proposer or an affiliated company of the Proposer with a covered entity or a General Market Participant, or by providing services to a covered entity or General Market Participant) and outline how such conflicts will be mitigated. The Proposer must also describe any formal policies or procedures that will identify and mitigate potential future conflicts of interest, and ensure that the Proposer's organization, management, and employees avoid financial interests and activities that create potential and actual conflicts of interest.

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Proposers selected for presentations should be prepared to discuss their policies and procedures utilized to identify and mitigate conflicts of interest, and how Proposer ensures that its organization, management, and employees avoid and mitigate conflicts of interest.

To enter into a contract with WCI, Inc., and maintain it, each selected organization and its representatives must also sign and comply with Attachment D1 – Organization Conflict of Interest and Confidentiality and Attachment D – Individual Conflict of Interest and Confidentiality of [WCI, Inc. Standard Agreement](#).

4. Is WCI, Inc. open to proposals where a financial-services solution is embedded in an existing platform that facilitates the delivery process, or is this purely for banking services?

This solicitation is being conducted solely for the purpose of selecting a Financial Services Administrator to complete all tasks detailed in Attachment A: Statement of Work.

5. Does WCI, Inc. have a preference between a single cross-border Proposer versus separate Proposers per country?

No. However, if this occurs and the Proposer is ultimately awarded the contract under the later anticipated release of a Request for Proposals (RFP) for the United States or Canadian Financial Services, the Proposer must be able to coordinate services and cooperate with the other Proposer(s) awarded a contract for the Financial Services of the other country or Participating Jurisdiction(s). The implementation of coordinated services between multiple FSAs may require additional development in both WCI, Inc.'s and each Contractor's IT systems.

6. What is the approximate breakdown of annual volumes (participating entities, allowance awards, bids, average number of bidders per auction, dollar volume, etc.) from each of the Participating Jurisdictions? Can you provide the same breakdown with actual numbers for 2025?

WCI, Inc. Public Market Data*	2025
a) Registered Entities (Market Participants) – Sep. 2025	
- California	808
- Québec	174
- Washington	202
b) Average Number of Qualified Bidders** per Event	
- California-Québec Joint Auctions	94 (California: 78 / Québec: 16)
- Washington Stand-Alone Auctions	47
- Washington Reserve Sales	18
c) Average Number of Allowances Sold per Event	
- California-Québec Joint Auctions	56.4 million
- Washington Stand-Alone Auctions	7.2 million
- Washington Reserve Sales	3.6 million
d) Total Annual Proceeds	
- California-Québec Joint Auctions (4 events)	6.3 billion USD
- Washington Stand-Alone Auctions (4 events)	2.0 billion USD
- Washington Reserve Sales (1 event)	200 million USD

*WCI, Inc. internal compilation from its Participating Jurisdictions Public Market Data. More details can be found in the Auction Results Reports and other public market data available on each Participating Jurisdiction's website: [California](#), [Québec](#), and [Washington](#).

** The number of qualified bidders is the number of entities approved to participate in an Auction. The number of entities applying to participate may exceed those approved to participate in an Auction. Each entity is represented by a minimum of 2 and up to 5 account representatives who may bid on behalf of the entity.

7. Is the Standard Agreement Template under Schedule B the mandatory governing agreement for the engagement of the Proposer? If Schedule B is mandatory, will WCI, Inc. review and accept the Proposer's agreement comments/change requests?

During the RFP portion of the solicitation, any Proposer's requested revisions to [WCI, Inc. Standard Agreement](#) (i.e., Attachment B of [Request for Expression of Interest \(REI # 2025-01\)](#)) will be evaluated to determine whether the revisions are acceptable to WCI, Inc. Proposers should be prepared to explain their requested revisions. Requested revisions will also be considered when scoring a Proposer's submission.

8. Will WCI, Inc. require the Proposer to enter into any ancillary agreements in addition to the governing agreement? If so, can WCI, Inc. provide a list of such agreements?

At this point, no ancillary agreements are contemplated beyond the content of [WCI, Inc. Standard Agreement](#).

9. Is WCI, Inc. only looking for the Proposer to provide escrow and paying agent services, including foreign exchange (FX), or is there a need for other services during the term of the contract?

WCI, Inc. is solely seeking an experienced and qualified Contractor to develop and provide financial services administration ("Financial Services"), including all tasks detailed in Attachment A: Statement of Work.

10. The Proposer will have a list of onboarding documents (including but not limited to required Know Your Client and Anti-money laundering (KYC/AML) onboarding and account opening documentation) that need to be completed by WCI, Inc. and potentially the bidders receiving cash or monetary instruments, in order to execute the governing agreement and effect the appointment. Do you have any objections to this?

The FSA will enter into a contract with WCI, Inc. to perform tasks such as opening accounts to record bid guarantees on behalf of entities and holding funds on behalf of the Participating Jurisdictions. WCI, Inc. is not engaged in any of the auction-related transactions between the FSA, Auction Participants, and Participating Jurisdictions.

The Financial Services Administrator (FSA) should take the necessary steps to complete the required AML and KYC activities under Canadian and United States laws.

11. Will there be a need for the Proposer to provide additional services in the future at the request of WCI, Inc.?

As stated under Task 6: Other Activities as Directed (p. 36) of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#):

Additionally, during the Contract, WCI, Inc. may request that the Contractor provide additional services directly related to the Financial Services. The Contractor will undertake additional activities only when directed in writing by WCI, Inc., and both parties agree in writing to such expansion. Upon receipt of any additional technical direction from WCI, Inc., the Contractor will detail its approach in writing for the requested work and provide an estimate of the level of effort and budget required to provide the requested services. The deliverables for this Task will be determined when the work is specified.

12. What is the anticipated contract term?

At this time, the contract term is unknown and must be reconfirmed by the WCI, Inc. Board of Directors. Based on previous contracts for this type of service, a range of two to five years seems likely.

13. Are any additional U.S. states or Canadian provinces expected to join the program during the contract term?

WCI, Inc. cannot comment publicly on prospective jurisdictions. Contractor should have scalable capabilities to support Financial Services for one or more new jurisdictions joining, with minimal impact on the existing programs.

14. Does the Proposer need to have an official physical presence within the applicable Participating Jurisdiction, or is any location within the same country sufficient, even if it falls outside the designated zone?

As further detailed in the Minimum Qualifications on p. 8 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#), the Proposer must have an official presence (meaning a physical location) in countries where they will perform the Financial Services (in the United States, Canada, or in both countries) but not necessarily within the specific State or Province which are part of our Participating Jurisdictions.

15. For Québec, is there a need for specific French-language-only support? If so, are there separate expected volumes or processing timelines specific to the Québec French-language only support?

As specified in this REI, French support services for Québec entities from Contractor should be provided within the same timeline that they are provided in English, and include, but may not be limited to the following:

- Establishing and verifying bank accounts and related exchanges with each entity to complete associated know your customer (KYC) requirements.
- Reviewing, assessing, accepting, and drawing upon any financial bid guarantees (letter of credit and letter of guarantee), and any associated follow-up if changes are required for acceptance or if someone wants to know the status of the review of their financial bid guarantees.
- Completing any follow-up required with a participant to ensure payment or draw on a financial bid guarantee, if needed, once an Auction has been certified, and Contractor has been instructed to do so.
- Providing all material required by Participating Jurisdictions, including input (e.g., wire instructions as well as delivery and return instructions for letter of credit) or reviewing (i) Auction public notices and (ii) Auction Training materials/presentations.

Contractor will be responsible for interpreting and determining compliance of bid guarantees and financial settlement. Contractor will not be responsible for interpreting bids or determining compliance in the bid process in any form.

16. Can WCI, Inc. share technical documentation and file format specifications for the Market Registry and Auction Platform?

Please refer to section 2.1 Market Registry Integration (p. 18) and section 2.3 Auction Platform Integration (p. 19) of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#) for file format specifications.

Additional information on file types, secure means of communication, and encryption supported by the Market Registry, Auction Platform, and WCI, Inc. Participating Jurisdictions may be discussed further during the upcoming individual Proposers' presentation and conference.

17. Will test or sandbox environments be available for integration validation?

Yes. WCI, Inc. will ensure that the selected Contractor(s) have access to test or sandbox environments to ensure smooth onboarding and compatibility of the Financial Services with other existing systems.

18. What is the historical ratio of cash vs. non-cash bid guarantees?

The distribution of submitted bid guarantees by type can vary significantly across auctions. In general, from a volume (i.e., number of bid guarantees) perspective, the majority of bid guarantees are submitted in cash, while the remaining are submitted as letters of credit.

The distribution of submitted bid guarantee values by type can vary significantly across auctions, depending on whether it is a joint auction, a jurisdiction-specific auction, or an auction for a new program. Based on a prior review of trends, some general trends specific to joint auctions include the following:

- A substantial portion of the total value of submitted bid guarantees is from letters of credit, while the remaining value of submitted bid guarantees is from cash.
- A substantial portion of bid guarantees submitted is for an amount less than \$50 million.
- The value of individual bid guarantees submitted varies greatly but has historically been in the range of \$12,500 to \$200,000,000.

19. Please clarify how Participating Jurisdictions provide FX instructions (per-event or request), and what timeframe the Financial Services Administrator (FSA) should expect between auction certification and receipt of FX instructions.

The current model is that, immediately after an event is certified (i.e., results published), jurisdictions send instructions to the FSA specifying an amount and a direction (CAD to USD or USD to CAD) for trading via a Spot rate.

Usually, this first trade is executed on certification day, though it may take up to a week for the jurisdictions to instruct the FSA to execute this first trade.

Once that first trade is executed, jurisdictions need pre-set rates available in the following days. Usually, a second trade at a pre-set rate completes the process in the days following certification.

20. Do jurisdictions prefer spot FX or pre-set rates, and are there any prescribed procedures for obtaining or applying FX rates?

Jurisdictions prefer to have both (Spot FX and pre-set rates) available.

21. Should the FSA operate strictly on an execution-only basis, or is any FX exposure or market-timing risk expected to be assumed by the FSA?

The FSA should operate on an execution-only basis.

22. Please confirm whether the FSA must maintain separate USD and CAD accounts in each country, and how FX transfers should be handled between jurisdictions and FSA accounts.

USD and CAD accounts should be available for each entity registered in Quebec so they can submit their bid guarantee in either currency. Entities can only submit guarantees in one currency per event. Entities can change currency between events.

There must be at least one separate USD and one CAD account for each jurisdiction to receive proceeds after the auction.

There is no specific requirement regarding the country location of the accounts.

23. Are sample pre-auction, post-auction, and reconciliation reports available for review?

WCI, Inc. cannot publicly disclose this information. P. 22 to 34 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#) summarizes the purpose and reporting requirements, including the type of content (and general data categories), to be included in each type of report. Access to sample reports could be provided during the Contractor transition period, if applicable.

24. Is there a service-level response time for participant inquiries?

The FSA must respond diligently to any participant inquiries to support the various deadlines outlined in the Typical Auction Timeline on p. 7 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#). A response within a day at the beginning of the auction application period may be fine, but as we approach any deadline, response time should not hinder participation.

25. What are the historical volumes of support requests during peak and non-peak auction periods?

The exact historical volumes cannot be provided and may vary across Participating Jurisdictions. However, in general, the volume of support requests should be generally low, except for the initial onboarding period (i.e., creation of bank accounts) and any change to the current process, which is expected to generate more requests in the beginning, until the change has been integrated by most entities.

26. Will WCI, Inc. provide standardized templates for consignment statements?

During a transition period for Financial Services, WCI, Inc. Participating Jurisdictions will work with the selected Contractor to provide standardized templates for consignment statements.

27. Does WCI, Inc. anticipate a transition period longer than the four months noted in the REI?

The four (4) months before the end of the Contractor's contract term is a minimum. At this point, WCI, Inc. plans for a longer transition period, of at least six (6) to nine (9) months (ideally), to ensure the success of such critical activity if it is ever needed. The exact length of the transition period should be reviewed with the selected Contractor(s).

28. What level of detail is expected in transition documentation?

The Contractor is expected to provide materials and assistance reasonably necessary to transfer the Financial Services to a Contractor designated by WCI, Inc., including copies of all materials and data necessary to support a smooth transition. Please refer to p. 37 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#) for details on the process and level of detail expected in transition documentation.

29. As it relates to the Letters of Credit (LoC), drawing, etc., does the Contractor need to be able to hold (LoCs) in its vault? If we are using our vault, will we receive copies of documents, LoCs, etc.? Who is the beneficiary of any LoC that is issued for bid guarantees? Would docs need to be held in a vault in both the US and Canada?

Yes, any LoC or bid guarantee received in physical form should be held in the Contractor's physical vault, located either in the US or Canada. The location of this vault should also ensure that it doesn't create additional delays in registering the bid guarantee if the LoC needs to be moved. Nowadays, most LoCs and bid guarantees are transmitted via electronic format and must be stored in the Contractor's secure electronic vault, hosted either in the US or Canada.

Currently, the beneficiary of any LoC issued for a bid guarantee is the Financial Services Administrator (FSA). It is possible to consult an example of the letter of credit on each WCI, Inc. Participating Jurisdictions' website:

- [Example LoC format for California](#)
- [Example LoC format for Québec](#)
- [Example LoC format for Washington](#)

30. Will the Contractor be required to combine any LoC information with our financial account data to capture data fields and reporting outlined in the REI?

Yes, as stated in the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#) on p. 29:

- Auction applicant pre-Auction Financial Services information, including Financial Services account numbers and bid guarantee amount(s) and type(s) received must be reported into the Market Registry. Through the Market Registry, the Financial Services information will be transmitted to Participating Jurisdictions.
- Systems and procedures should support tracking and reporting updates on established accounts to the Market Registry and Participating Jurisdictions.
- The Contractor will work with the approved participants to have any unacceptable form of financial guarantee amended prior to the financial guarantee submission deadline. If an unacceptable form cannot be amended by the submission deadline, the Contractor will notify the Participating Jurisdictions as appropriate and return the guarantee directly to the party identified in the Auction application, in accordance with the instructions of the relevant Participating Jurisdiction, for return of bid guarantees.

Reporting requirements on bid guarantees are also detailed further on p. 30-31:

- From the start of an Auction application period and continuing until all properly received bid guarantees are reflected, the Contractor will provide the Participating Jurisdictions with a daily electronic report of Auction applicants, which includes the Financial Services account information. Upon receipt and deposit of the applicant's bid guarantee(s), a daily report(s) will be provided to Participating Jurisdictions to indicate the amount(s) and type(s) of bid guarantee(s) received and, for Joint Auctions, the currency of participation. For participants registered under a Canadian provincial program in a Joint Auction, the Contractor will reconcile the currency in which the bid guarantee is submitted to the currency selected during the application process. The Contractor will provide the final report of all applicants, indicating established Financial Services accounts and all bid guarantees received, no later than (2) business days after the applicable bid guarantee submission deadline.
- Following certification of the Auction, until final payment of proceeds, the Contractor will provide a daily report on the status of financial settlement to Participating Jurisdictions. The report will include a complete list of approved applicants (qualified bidders) under the Contractor's responsibility, the amount due from each qualified bidder, the total amount of the bid guarantee submitted, the funds received from each bidder to pay for the allowances purchased in the Auction, the status of the return of excess funds or document bid guarantee instrument(s), and the currency of the funds used for settlement.

31. Is the Contractor expected to act as a collateral agent for applicants that provide a Bid Guarantee?

As stated in the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#) on p. 30:

The Contractor must be able to accept and review, assess, and draw upon any documents (e.g., LOC or LOG) submitted in English or French (only for entities or voluntary participants registered in Québec).

Based on the form(s) of bid guarantee selected, the Auction applicant will also complete instructions for the return of any unused bid guarantee amounts or document bid guarantee instruments after the Auction is completed.

A bid guarantee submitted in any form other than cash must be payable within three (3) business days of payment request. All other required terms and conditions for document bid guarantees are to be developed by the Contractor in coordination with the Participating Jurisdictions. Specific deadlines apply to the receipt of all bid guarantees. The Contractor's systems and procedures must identify the date and time of receipt for all bid guarantees.

32. Please provide more details on bid guarantees via LoC; what's the expectation for the Contractor and management of the LoC?

Please refer to the responses provided to the previous two questions or to the additional details on p. 29-34 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#).

33. Can you share an illustrative example of an auction participant's potential financial transactions within an auction? We understand that participants need to submit a bid guarantee 12 days before the auction, and that the deadline to pay for allowances won is 14 days after the auction, but that proceeds to jurisdictions are due 26 days after. Are cash bid guarantees then essentially held in the winning bidders' accounts until payment to the jurisdiction (38 days)?

As illustrated on p. 7 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#):

Auction applicants can submit a bid guarantee anywhere between the start of the application period, starting 60 days before the event, and the deadline to submit a bid guarantee, 12 days before the event.

After the publication of auction results (i.e., auction certification), within 7 days after the event, all entities receive payment instructions for their successful bids (i.e., allowance awarded). The entities that submitted a LoC as a guarantee have 7 days to wire the funds corresponding to the value of their successful bids. All allowances awarded must be paid by successful bidders, and all excess bid guarantees must be returned to the qualified bidders within 14 days after the event.

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All successful bidders' payments (funds from each entity's account) must be transferred to the Jurisdiction Accounts to initiate and complete the currency exchange process and the subsequent transfer of proceeds to each Jurisdiction, upon directions received from Participating Jurisdictions.

34. Are there FX requirements still applicable if the Contractor only supports the US or Canadian jurisdictions?

FX requirements are applicable for any Jurisdiction participating in a Joint-Auction. If many contractors are selected to provide the required Financial Services in Canada and the US, the exact process and responsibilities would need to be further discussed with both the Canadian and U.S.-based financial services administrators and Participating Jurisdictions, as auction processes and procedures will need to be developed to manage coordination between the two FSAs.

35. Once the contract is signed and assuming a new Contractor is selected, how much time would the new Contractor have to build out the infrastructure and reporting requirements before providing financial services on an auction?

At this point, WCI, Inc. plans for a transition period of at least six (6) to nine (9) months (ideally), to ensure the success of this critical activity if needed. The exact length of the transition period should be reviewed with the selected Contractor(s).

36. Is there an opportunity for a meeting with WCI, Inc. to address any lingering questions before the EOI is due on February 20th?

In accordance with the Solicitation Schedule provided on p. 2 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#), Proposers' Technical Presentations and review with WCI, Inc. and its Participating Jurisdictions are planned between March 2nd and March 20th of 2026. Any feedback provided by WCI, Inc. and its Participating Jurisdictions could then be integrated into the Proposers' responses to a subsequent Request for Proposals (RFP), currently anticipated during the Summer of 2026.

37. Is there a form of standard agreement and package of agreements that each auction participant enters into with the current Contractor for bank account opening that can be shared?

No. The FSA should take the necessary steps to complete the required AML and KYC activities as required under law within the Participating Jurisdictions. A formal agreement between the FSA and each entity would be required only if required by law in Participating Jurisdictions.

38. Will WCI, Inc. entertain a Contractor servicing CAD accounts from another jurisdiction (i.e., the US or London)? Do all CAD accounts need to be opened in Canada, or can they be opened in another jurisdiction (e.g., London or Dublin)?

If possible, accounts opened in Canada would be preferred from an operational perspective, but it is not mandatory, and these could be opened outside of Canada. However, as stated in the Minimum Qualifications on p. 8 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#), to be eligible, the Proposer must:

- have an official presence (meaning a document location) in countries where they will perform the Financial Services (in the United States, Canada, or in both countries);
- be able to provide all required Financial Services in accordance with all applicable national and local laws and regulations of WCI, Inc. and the Participating Jurisdictions;
- if providing Financial Services in the United States, be a federally chartered bank regulated by the Office of the Comptroller of the Currency (OCC);
- if providing Financial Services in Canada, be a financial institution regulated by the Canadian Office of the Superintendent of Financial Institutions ("OSFI") or by the *Autorité des marchés financiers (AMF)*;
- if providing Financial Services in Québec, be able to provide all required Financial Services in French and English. Proposer may satisfy this language requirement by engaging a subcontractor, but this must be disclosed in the Proposer's response to this REI.

In other words, all work (including account structure, account setup, account verification, account management, and bid guarantee verification, etc.) required by the Contractor must comply with Canadian national and any applicable subnational laws for an Offeror seeking to offer Canadian-based financial services.

39. What was the total amount of cash holdings for each region from all auctions in 2024 and in 2025? What's the average duration that cash is held in accounts?

The total amount of cash holdings is considered market sensitive and cannot be disclosed.

To get a sense of the theoretical duration that cash is held in accounts, refer to the illustration p. 7 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#), and the response to question 33 in the current document.

40. What was the total amount of bid guarantee holdings for each region from all auctions in 2024 and in 2025?

This information is considered market sensitive and cannot be disclosed. However, the total Annual Proceeds to Participating Jurisdictions and Consigning Entities, which underrepresent the total amount of bid guarantees, can be provided, per WCI, Inc. internal compilation from its Participating Jurisdictions Public Market Data:

Total Annual Proceeds to Participating Jurisdictions and Consigning Entities*	2024	2025
- California	7.2 billion USD	5.6 billion USD
- Québec	1.1 billion USD	0.8 billion USD
- Washington	1.1 billion USD	2.2 billion USD

*WCI, Inc. internal compilation from its Participating Jurisdictions Public Market Data. More details on auction proceeds for each event are available on the websites of the Participating Jurisdictions: [California](#), [Québec](#), and [Washington](#).

41. What percentage of auction participants have participated in previous auctions?

Auction participants vary from auction to auction. A vast majority of auction participants are recurrent. Some participate more frequently than others, with a few participating on an ad hoc basis.

After each auction, a report is published that lists all approved applicants (qualified bidders). As indicated in the qualified bidders list, a qualified bidder is an entity that completed the auction application or confirmed an intent to bid for the auction, submitted an acceptable bid guarantee, and was approved to participate in the auction. This information is publicly available on Jurisdiction web pages and can be helpful to assess further the changes in participation in auctions:

- [California Auction and Reserve Sale Result Reports](#)
- [Québec Auction and Reserve Sale Result Reports](#)
- [Washington Auction and Allowance Price Containment Reserve \(APCR\) Result Reports](#)

42. Is the timeline to complete the KYC for an Auction Participant the time between the deadline to apply (30 days before an auction event) and the deadline to submit a bid guarantee (12 days before an auction event)? What are the ramifications if the FSA and the Auction Participant are unable to complete the KYC and subsequent account opening process within that 18-day period?

All Auction participants must establish an account with the FSA to deposit a bid guarantee for each Auction.

KYC can begin as soon as an entity has submitted its Auction application. Therefore, KYC can begin 60 days prior to the auction. Accounts must be opened several days before the bid guarantee deadline to allow auction applicants to send their bid guarantee in time.

Onboarding a new FSA will create a rush to implement several KYCs for the first few auctions. FSA should plan its capacity accordingly, having more resources available for the first 3-4 events before the number of accounts needed to be opened diminishes.

43. Is the Contractor expected to have any discretionary duties? If so, please describe.

The FSA should take the necessary steps to complete the required AML and KYC activities as required under law within the Participating Jurisdictions. A formal agreement between the FSA and each entity would be required only if required under law within Participating Jurisdictions.

44. Can you expand on the current infrastructure or tools in place to provide the requisite reporting on this program? Are there specific file formats the Contractor should use? Are files populated in Excel, via database applications, or pulled from the Contractor's online banking tools?

Please refer to section 2.1 Market Registry Integration (p. 18) and section 2.3 Auction Platform Integration (p. 19) of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#) for information about the current infrastructure or tools in place to provide the requisite reporting on this program.

Additional information on file types, secure means of communication, and encryption supported by the Market Registry, Auction Platform, and WCI, Inc. Participating Jurisdictions may be discussed further during the upcoming individual Proposers' presentation and conference.

45. Is the Contractor expected to indemnify any parties as part of this program?

Please refer to section 10. Indemnification of Attachment C. WCI, Inc. General Terms and Conditions, and other indemnification requirements specified in [WCI, Inc. Standard Agreement](#).

46. Is there any additional information about the Market Registry that can be shared? How frequently should data be pulled from the Market Registry? Are APIs available to pull or provide the needed reporting data to the Contractor?

For information about the Market Registry and reporting requirements, please refer to section 2.1 Market Registry Integration (p. 18) and section 3. Auction/Reserve Sale Financial Services of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#).

Also, as illustrated and further detailed in Figure 1. Typical Auction Timeline and Actions from the Financial Services Administrator (FSA) on p. 7:

- Before the Auction/Reserve Sale, the FSA must:
 - o #1. Daily download the Events Application Report from the Market Registry.
 - o #4. Daily report of cash and holding files for validation and reporting of bid guarantee status for all event applicants
 - o #5. Upload cash & holding data into the Market Registry.
- After the Auction/Reserve Sale, the FSA must:
 - o #8. Download the Financial Settlement Report and begin the financial settlement process (including providing information for currency exchange to Participating Jurisdictions).
 - o #11. Daily, provide a financial settlement reconciliation report to the Participating Jurisdictions.
 - o #13. Submit the interim Financial Reconciliation Report to Participating Jurisdictions (indicating all funds received, bid guarantees returned, and currency exchange completed).
 - o 14. Submit Final Financial Reconciliation Report to Participating Jurisdictions, indicating all funds received, bid guarantees returned, currency exchange completed, and proceeds paid.

There is no API currently in place.

47. Is there a demo environment of the Market Registry that participants in this REI are able to gain access to ahead of time?

Access to a demo environment could be provided during the Contractor transition period, if applicable.

48. Could the Contractor leverage a master bilateral agreement between WCI, Inc. and the Contractor where all auction client accounts are opened at the direction of WCI, Inc., but each account would be for the benefit of the applicable auction client party?

No, that is not an option. WCI, Inc. cannot assume any responsibility for or exercise any authority over any of the funds. Each covered entity (i.e., auction applicant) and Participating Jurisdiction must open and own its own account.

49. Is there any existing IP that the new Contractor can utilize when transitioning into the services?

The Contractor is expected to provide materials and assistance reasonably necessary to transfer the Financial Services to a Contractor designated by WCI, Inc., including copies of all materials and data necessary to support a smooth transition. Please refer to p. 37 of the ongoing [Request for Expression of Interest \(REI # 2025-01\)](#) for details on the process and level of detail expected in transition documentation.