

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: RI ENERGY EFFICIENCY AND)	
RESOURCES MANAGEMENT)	
COUNCIL’S PROPOSED STANDARDS)	DOCKET NO. 3931
FOR ENERGY EFFICIENCY AND)	
CONSERVATION PROCUREMENT)	
AND SYSTEM RELIABILITY)	

**REPLY COMMENTS OF THE RHODE ISLAND ENERGY EFFICIENCY
RESOURCES MANAGEMENT COUNCIL, ENVIRONMENT NORTHEAST,
AND NATIONAL GRID IN RESPONSE TO THE COMMENTS OF
BLUEWATER WIND LLC, AND CAPE WIND LLC ON THE
ENERGY EFFICIENCY RESOURCE MANAGEMENT
COUNCIL’S PROPOSED STANDARDS FOR ENERGY EFFICIENCY,
CONSERVATION MANAGEMENT AND SYSTEM RELIABILITY**

The Rhode Island Energy Efficiency and Resources Management Council (“EERMC”), Environment Northeast, and National Grid submit the following comments and responses to a number of the issues and subjects raised by Bluewater Wind LLC and Cape Wind LLC’s filings on the Energy Efficiency Resource Management Council’s (“EERMC” or “the Council”) proposed standards for energy efficiency, conservation management and system reliability (“Standards”) that were submitted on February 29, 2008.

In regard to the comments of Blue Water Wind and Cape Wind concerning large scale renewable projects, the EERMC, Environment Northeast, and National Grid note that large scale wind resources will be part of National Grid’s “Supply Procurement Plan” that shall be proposed to the Commission by March 1, 2009 pursuant to RIGL § 39-1-27.8. Energy Efficiency and System Reliability Procurement does not to address wholesale power purchase plans (including large scale wind resources), and therefore the Council’s proposed Standards filed on February 29, 2008 did not address those resources. These resources shall be addressed in National Grid’s proposed response to § 39-1-27.8, the Supply Procurement Plan due by March 1, 2009.

CONCLUSION

WHEREFORE, for the above-stated reasons, the EERMC, Environment Northeast, and National Grid ask that the Commission adopt the comments set forth above and reflect those comments in the final standards to be adopted by this Commission.

Respectfully submitted, **the Rhode Island Energy Efficiency Resource Management Council (EERMC), Environment Northeast, and National Grid**

By Its Attorneys,

/s/ R. Daniel Prentiss

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of May, 2008, I emailed a copy of this document to all persons providing email addresses and sent a paper copy by regular mail to any remaining persons, all as designated in the official service list compiled by the Commission Clerk in this proceeding.

/s/ R. Daniel Prentiss

R. Daniel Prentiss