

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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In the Matter of)	
)	
Fulton LFGTE)	Docket No. 4133
)	
Petition for Designation as an)	
Eligible Renewable Energy Resource)	
_____)	

MOTION FOR WAIVER OF BILATERAL CONTRACT

Innovative Energy Systems, LLC ("IES"), pursuant to Rule 1.10(b) of the State of Rhode Island Public Utilities Commission's Rules ("Commission") Rules of Practice and Procedure, hereby petitions the Commission for waiver of certain rules. Specifically, IES requests that the Commission waive Section 5.1(ii)(a) of the Rhode Island RES Rules and Regulations which requires a unit-specific bilateral contract for the sale and delivery of energy into NEPOOL.

IES, on November 20, 2009, filed with the Commission its Application for Certification of Eligibility of Renewable Energy Resources ("Application"). In its Application IES requested standard certification as an eligible renewable energy resource biomass facility using methane gas from the Fulton County Landfill, located in Johnstown, New York.

As supplemental information to our Application filing, we want to supply the following information,

GIS Registration Number	IMP32957
Start Date for Fulton's generated energy into ISO-NE	June 4, 2010
Status of other New England state REC Registrations	Approved in CT, NH, ME, & MA

The process for moving energy in ISO-NE is described below:

The energy management team is currently performing weekly scheduling into the ISO-NE Day Ahead and Real Time Markets. This entails scheduling into the hourly, Day Ahead, Real Time markets

within the NYISO and ISO-NE, and linking the schedules from the NYISO to the schedules done in the ISO-NE through a NERC Web Tagging Procedure. On a monthly basis utilizing settlement data from the NYISO and ISO-NE, hourly generation and exports are determined/reviewed and REC claims are performed in the NEPOOL GIS. This supporting data is then sent to the GIS Administrator for final review/approval prior to the GIS Administrator's issuance of Fulton's RECs.

Based on the foregoing, IES respectfully requests that the Commission grant this Petition and waive application of Section 5.1(ii)(a) of the Rhode Island RES Rules and Regulations.

Respectfully submitted,

Innovative Energy Systems, LLC

By

Dated: 5/15/13



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing petition was served on the service list for this Docket on the 16 day of May, 2013.



Emily Zambuto
Manager of Environmental Programs

Docket No. 4133 – Innovative Energy Systems, LLC –Application for Certification as Eligible Renewable Energy Resource

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