

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

In the Matter of)
HOWARD WIND LLC) Docket No. 4408
Petition for Designation as an)
Eligible Renewable Energy Resource)

MOTION FOR WAIVER OF BILATERAL CONTRACT

Howard Wind LLC (“Howard”), 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, Howard 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.

Howard, on May 3, 2013 filed with the Commission its Application for Certification of Eligibility of Renewable Energy Resources (“Application”). In its Application, Howard requested standard certification as an eligible renewable energy resource wind facility located in Howard, NY.

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

GIS Registration Number	NY323690
Start Date for Howard’s generated energy into ISO-NE	March 2013
Status of other New England state REC Registrations	CT in process

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

The energy management team will perform weekly scheduling into the ISO-NE Day-Ahead and Real-Time markets. This entails scheduling into the hourly, Day-Ahead, and 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 Howard RECs.

Based on the foregoing, Howard 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,

HOWARD WIND LLC

By its Chief Commercial Officer



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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 7th day of MAY, 2013.