

# 4465



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION  
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Chairperson Margaret E. Curran  
Commissioner Paul J. Roberti  
Commissioner Herbert F. DeSimone, Jr.

November 25, 2013  
Via Email

Thomas R. Teehan, Esq.  
The Narragansett Electric Company  
d/b/a National Grid  
280 Melrose Street  
Providence, RI 02907

Re: 2012 Renewable Energy Standard ("RES") Annual Compliance Filing

Dear Mr. Teehan:

Thank you for submitting The Narragansett Electric Company's d/b/a National Grid ("National Grid") 2012 Renewable Energy Standard ("RES") Annual Compliance Filing ("Filing"). The Filing was received by the Public Utilities Commission ("PUC") on July 1, 2013.

The PUC has the statutory responsibility of verifying the RES compliance of all Obligated Entities. R.I. Gen. Laws § 39-26-6(a)(4) states: "[a]nnual compliance filings [are] to be made by all obligated entities within one month after NE-GIS reports are available for the fourth (4<sup>th</sup>) quarter of each calendar year. [National Grid] shall cooperate with the [PUC] in providing data necessary to assess the magnitude of obligation and verify the compliance of all obligated entities."

Together with its consultant ("GDS Associates"), PUC staff has reviewed the Filing and identified a potential issue relative to Renewable Energy Certificates ("RECs") procured from a particular facility. Based on an informal review, it is PUC staff's understanding that National Grid believed that it had procured a sufficient number of "New" RECs based on information contained in the NEPOOL Generation Information System ("NEPOOL GIS") reports for the 2012 compliance year. It has come to the attention of PUC staff, after a review of the generation information upon which the Filing was based, however, that one facility had not been accurately defined by the NEPOOL GIS Administrator.

The PUC is now considering how to treat an Obligated Entity's annual compliance filing when it relies in good faith on NEPOOL GIS reports for purposes of compliance with the RES but it is subsequently determined that there was an error in the NEPOOL GIS report and that disqualification of the erroneously credited resource might result in non-compliance. More

specifically, under such a circumstance, may the PUC nonetheless verify that the Obligated Entity is in compliance with the RES as codified in R.I. Gen. Laws §§ 39-26-1 to 39-26-10?

The PUC would appreciate a response as soon as possible. Please feel free to contact me with any questions at 401-780-2147.

Sincerely,



Cynthia G. Wilson-Frias  
Senior Legal Counsel

cc: Margaret Janzen, National Grid  
Luly E. Massaro, Commission Clerk