

Rhode Island Renewable Energy Standard Annual Compliance Filing – Requirements Overview

(Revised 5/20/2020)

Pursuant to the Rhode Island Public Utilities Commission Rules and Regulations Governing the Implementation of a Renewable Energy Standard (RES Regulations), all Obligated Entities¹ must submit an **Annual Compliance Filing** (Compliance Filing) to the Rhode Island Public Utilities Commission. **The Compliance Filing must be made no later than July 15, 2020.**²

The Compliance Filing forms, as well as detailed instructions, are available for download below.

General Instructions for completing the Annual Compliance Filing

Review all instructions carefully, including footnotes, before completing the Compliance Filing. Also review the RES Regulations (available at our website, <http://www.ripuc.org/utilityinfo/res.html>) in detail to understand the applicable requirements. The instructions provided here, and for download, summarize the Compliance Filing requirements but should not be relied upon as a summary of the RES Regulations itself.

Complete this Compliance Filing using a computer or black ink. You must also provide an electronic spreadsheet (MS Excel) version of **both** Table One **and** the NEPOOL GIS Certificate documentation required to complete Columns F & I, as well as the Banked Certificates information, of Table One. Additionally, send a PDF copy of the Compliance Filing to RES.Filings@puc.ri.gov.

Compliance Options & Flexibility

Compliance with the RES Regulations may be demonstrated either through procurement of NEPOOL GIS Certificates from RI PUC-certified Generating Units, or through Alternative Compliance Payments. Where GIS Certificates are utilized, Obligated Entities must provide an MS Excel spreadsheet version of the NEPOOL GIS “My Settled Certificates Disposition” report for each quarter of the applicable Compliance Year. These reports must be provided for both the New and Existing portions of the RES requirement. Where Alternative Compliance Payments are utilized, the Obligated Entity shall include with its Annual Compliance Filing copies of any receipt(s) for payment(s)

¹ RES Regulation 2.3(25) defines Obligated Entity as: (i) a person or entity that sells electrical energy to End-use Customers in Rhode Island, including, but not limited to: Nonregulated Power Producers (NPP) and electric utility distribution companies, as defined in Section 39-1-2 of the General Laws of Rhode Island, supplying standard offer service, last resort service, or any successor service to End-use Customers; including Narragansett Electric, but not to include Block Island Power Company or Pascoag Utility District; or (ii) to the extent not otherwise required to register and act as a NPP, any customer buying electricity supply directly from wholesale markets. In no event shall the ISO or NEPOOL be considered an Obligated Entity.

² Within thirty (30) calendar days after NEPOOL GIS reports are available for the fourth (4th) quarter of the applicable Compliance Year. RES Regulation 2.8(E).

made to the Rhode Island Commerce Corporation applicable to the Compliance Year. Alternative Compliance Payments must be submitted by wire transfer to the Rhode Island Commerce Corporation no later than June 30, 2020. In the event an Obligated Entity has New GIS Certificates in excess of its obligation, the entity may – per RES Regulation 2.8(D)(2) – “bank excess compliance for up to two (2) subsequent Compliance Years, capped at thirty percent (30%) of the current year’s obligation.” Any Obligated Entity using banked certificates toward compliance must meet the requirements of RES Regulation 2.8(H).

Product-Based Compliance

All Obligated Entities are required to be in compliance for each Compliance Year with regard to each individual Electrical Energy Product. Whenever an Obligated Entity sells more than one Electrical Energy Product during a Compliance Year, each Product must have its own sub-account at the NEPOOL-GIS. RES Regulation 2.3(A)(6) defines an Electrical Energy Product as “an electrical energy offering, including but not limited to last resort and standard offer service, or any successor service, that can be distinguished by its Generation Attributes or other characteristics, and that is offered for sale by an Obligated Entity to End-use Customers.” RES Regulation 2.3(A)(12) defines Generation Attributes as “the non-price characteristics of the electrical energy output of a generation unit including, but not limited to, the unit’s location, fuel type, actual emissions, vintage and policy eligibility.”

Non-Compliance:

Any Obligated Entity failing to comply with the RES Regulations or Compliance Filing requirements will receive a warning letter, including a stated date by which such failure must be cured. Failure to comply by the letter date will result in license suspension, and a prohibition on enrolling new customers. If the problem is not corrected by the dates in the suspension notice, the Entity’s license as a Nonregulated Power Producer will be revoked.

Note: RI RES Generation Attributes reported in the Filing may not be sold, retired, claimed or represented as part of electrical energy output or sales, or used to satisfy obligations in jurisdictions other than Rhode Island pursuant to R.I. Gen. Laws § 39-26-8(b). RI RES Generation Attributes reported specifically for RES compliance in the Filing cannot also be used to satisfy marketing claims for a voluntary green power product in the same or any other Compliance Year, in Rhode Island or in any other state.

Questions about RES Compliance Filings should be addressed to Luly Massaro at (401) 780-2107 or at RES.Filings@puc.ri.gov.