

JOHN P. CASEY

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VIA REGULAR MAIL AND ELECTRONIC MAIL ONLY

October 16, 2023

Luly E. Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: MP2 ENERGY NE LLC's MOTION FOR USE OF 2,933 NEW RENEWABLE ENERGY RESOURCE RECS FOR RHODE ISLAND 2022 RES COMPLIANCE

Dear Ms. Massaro:

On behalf of MP2 Energy NE LLC dba Shell Energy Solutions, enclosed please find the subject motion, which we ask be placed on the agenda of the Commission's next meeting.

Thank you for your attention to this matter. If you have any questions, please contact me at (860) 275-8359.

Sincerely,



John P. Casey

Enclosure

Copy to (via electronic mail only):
Edwin Dearman, Shell Energy Solutions
res.filing@puc.ri.gov
admin@rhodeislandres.com

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

October 13, 2023

MP2 ENERGY NE LLC's
MOTION FOR USE OF 2,933 NEW RENEWABLE ENERGY RESOURCE RECS
FOR RHODE ISLAND 2022 RES COMPLIANCE

MP2 Energy NE LLC dba Shell Energy Solutions (“Shell Energy”) hereby moves the Rhode Island Public Utilities Commission (“Commission”) to allow Shell Energy to use 2,933 New Renewable Energy Resource renewable energy credits (“RECs”), inadvertently retired to Shell Energy’s Rhode Island Reserve subaccount in the New England Power Pool Generation Information System (“NEPOOL GIS”), for Shell Energy’s compliance with the Rhode Island 2022 renewable energy standard (“RES”). In support of this motion, Shell Energy states the following:

1. Shell Energy inadvertently retired 2,933 RECs to Shell Energy’s Rhode Island Reserve subaccount instead of Shell Energy’s Rhode Island Settled subaccount in NEPOOL GIS. These RECs are detailed on the NEPOOL GIS My Certificates Disposition Report attached hereto at Attachment A. These RECs are intended to be used for Shell Energy’s Rhode Island 2022 RES obligations and not any other purposes. *See* Attachment A (listing RI as Reserve Retirement State).
2. Because Shell Energy originally procured the 2,933 RECs for purposes of compliance with the Rhode Island 2022 RES, if Shell Energy is not permitted to use the 2,933 RECs for that purpose, it will be subject to an alternative compliance payment in Rhode Island even though it already purchased the necessary RECs to meet its obligations.

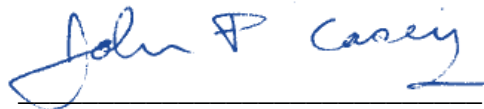
3. Because the NEPOOL GIS trading period has closed,¹ the RECs have been retired and cannot be used for any other purpose. *See* NEPOOL GIS Operating Rules, Rule 3.5 (“At the end of such Trading Period, all Reserved Certificates in the Reserved Certificate account shall be retired and shall no longer be available for further transfer, and their attributes shall not be included in any Residual Mix Certificates.”).

4. Further, if the Commission approves the use of the 2,933 RECs for Rhode Island 2022 RES compliance, Shell Energy will use the 2,933 RECs only for that purpose and will not seek to use them for any purpose. *See* Attachment B.

WHEREFORE, for all of the foregoing reasons, Shell Energy hereby requests that the Commission allow the use of the 2,933 RECs for Shell Energy’s compliance with the Rhode Island 2022 RES requirements.

Respectfully submitted,
MP2 ENERGY NE LLC

By its Attorneys,
ROBINSON & COLE LLP



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¹ *See* <https://nepoolgis.com/> (indicating that end of Q4 trading period was June 15, 2023).

Exhibit A

Attachment A

My Certificates Disposition Report; Account Holder ID: 17953; From '2022/Q1' to '2022/Q4'. Print

Disposition	Disposition Effective Quarter	Certificate Type	Transferee	Voluntary	Reserve Retirement State	Subaccount ID	Subaccount Name	Product	State	Month of Generation	Unit ID	Generator Plant - Unit Name	Certificate Serial Numbers	Fuel Type	Quantity	RI New Renewable Resource	RI Existing Renewable Resource
Reserved	2022/Q4	Generation	RI New	No	RI				NH	2022-01	MSS15115	LEMPSTER	7675630 - 3600 to	Wind	5	Yes	No
Reserved	2022/Q4	Generation	RI New	No	RI				NH	2022-06	MSS38553	ANTRIM WIND	8002589 - 1823 to	Wind	2,047	Yes	No
Reserved	2022/Q4	Generation	RI New	No	RI				NH	2022-07	MSS38553	ANTRIM WIND	8338946 - 1 to 689	Wind	689	Yes	No
Reserved	2022/Q4	Generation	RI New	No	RI				ME	2022-12	MSS40343	BULL HILL WIND	8682844 - 9993 to 10184	Wind	192	Yes	No

Exhibit B

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

October 13, 2023

**AFFIDAVIT OF EDWIN DEARMAN IN
SUPPORT OF MP2 ENERGY NE LLC'S
MOTION FOR USE OF 2,933 NEW
RENEWABLE ENERGY RESOURCE RECS
FOR RHODE ISLAND 2022 RES
COMPLIANCE**

I, EDWIN DEARMAN, do hereby declare and state under penalty of perjury as follows:

1. I am the Vice President of Regulatory Affairs for MP2 Energy NE LLC dba Shell Energy Solutions ("Shell Energy") and my principal place of business is The Woodlands, Texas.

2. By this affidavit, I support Shell Energy's motion requesting that the Rhode Island Public Utilities Commission ("Commission") allow Shell Energy to use 2,933 new Renewable Energy Resources renewable energy credits ("RECs") for compliance with the Rhode Island 2022 Renewable Energy Standard ("RES") (the "Motion").

3. Shell Energy inadvertently retired 2,933 RECs to Shell Energy 's Rhode Island Reserve subaccount instead of Shell Energy's Rhode Island Settled subaccount in the New England Power Pool Generation Information System ("NEPOOL GIS"). These RECs are detailed on Attachment A to the Motion. These RECs are intended to be used for Shell Energy's Rhode Island 2022 RES and not for any other purposes.

4. Because Shell Energy originally procured the 2,933 RECs for purposes of compliance with the Rhode Island 2022 RES, if Shell Energy is not permitted to use the 2,933 RECs for that purpose, it will be subject to an alternative compliance payment in Rhode Island even though it already purchased the necessary RECs to meet its obligations.

5. If the Commission approves the use of the 2,933 RECs for Rhode Island 2022 RES compliance, Shell Energy will use the 2,933 RECs only for that purpose and will not use them for any



purpose other than Rhode Island 2022 RES compliance.

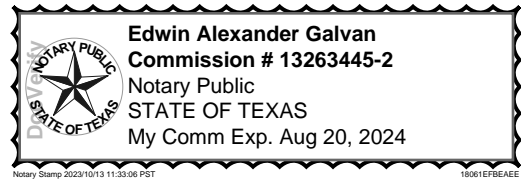
I hereby affirm that the foregoing is true and correct to the best of my knowledge and belief.

Edwin Dearman
Signed on 2023/10/13 11:33:06 -8:00

Edwin Dearman

Sworn to and subscribed before me October 13, 2023.

Edwin Galvan
Signed on 2023/10/13 11:33:06 -8:00
Notary Public



Notarial act performed by audio-visual communication

