

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC  
UTILITIES**

IN RE: RULES AND REGULATIONS  
GOVERNING THE IMPLEMENTATION  
OF RENEWABLE ENERGY STANDARD

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Docket NO. 3798

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PUBLIC UTILITIES COMMISSION

**Written Comments by  
Conservation Services Group Inc.**

Conservation Services Group Inc. (“CSG”) submits these written comments in response to the “Notice of Rulemaking and Public Hearing” issued by the Public Utilities Commission (“Commission”) on January 9, 2007. The Commission has requested comments on the “Commission’s plan to amend the current Rules and Regulations Governing the Implementation of a Renewable Energy Standard adopted by the Commission on January 1, 2006.”

CSG appreciates this opportunity to comment on Commission’s amendments to “bring the rules into conformance with recent changes to the New England Power Pool (“NEPOOL”) Generation Information System “(GIS)” rules.” These amendments will require generation data from behind-the-meter projects located in Rhode Island to be directly entered into the GIS by independent, third party verifiers. CSG strongly believes the creation of GIS Certificate, from the generation data entered into the GIS, should be held to strong data quality standards. By requiring that GIS Certificate creation data be entered into the GIS by State approved independent verifiers, who will not financially benefit from the sale of GIS Certificates, will ensure the integrity of the GIS Certificates and the Rhode Island Renewable Energy Standard “RI RES”).

1. a. CSG believes, with respect to the RI RES section 6.8 (iii) (e), that the owner should be responsible “to ensure that individual units comply with all the eligibility requirements” of RI RES. The role of the verifier should be for data quality control and verification; the compliance responsibility should fall on the owner of the units who will have the greatest incentive, the GIS Certificates, to maintain the unit’s compliance with the RI RES.

b. The responsibility to ensure that “the NEPOOL GIS Certificates created accurately represent generation” should be that of the verifier’s. The purpose of a third party verifier is to ensure the generation data being entered into NEPOOL GIS, accurately represents the electric generation that occurred at the Generation Unit.

c. CSG believes that if an “independent determination that the Generation Unit exists” is required by the RI RES, then the Verifier is the appropriate party to make that determination. A site visit to the Generation Unit by a Verifier is not a burdensome requirement for a Verifier already monitoring the generation data of the Generation Unit.

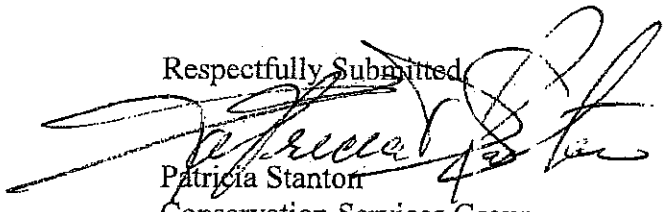
d. CSG believes the Commission should specify the required details necessary for “a procedure for the Verifier to report to the Commission on the results of the verification process,” such as “frequency, form or content.” An established procedure will ensure consistence in how the information is collected and presented to the Commission, this will further bolster the integrity of behind the meter generation data.

2a. CSG believes, with respect to the RI RES section 6.8 (iii) (g), that the Verifiers should enter production data into the GIS in the aggregate. The Verifier should maintain documentation to support the individual production that is totaled for the aggregate data entries. To require individual data entries for an aggregation that could

have many Generation Units, would be burdensome without effectuating improvements in data quality.

b. The data entered into the NEPOOL GIS should be by the quantity of energy produced since the last entry. Entering data as produced in the time period, as opposed to cumulative readings, coincides more appropriately with how GIS certificates are traded. GIS certificates are traded either based on monthly generation in a forward trade, or quarterly, neither of which is based on cumulative data, but the generation created in that time period.

Respectfully Submitted,



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