

May 4, 2007

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

RE: Docket 3798 – Rules and Regulations Governing the Implementation of a Renewable Energy Standard Verifier and Aggregation Owner – Corrected Version

Dear Ms. Massaro:

This filing contains National Grid's¹ comments in response to the Supplemental Notice of Rulemaking and Hearing issued by the Commission on April 3, 2007 in this docket.

On May 3, 2007, the Company filed comments in the above proceeding. After submitting these comments to the Commission, the Company noticed that on page 2, the letter contained two inadvertent reference errors. Therefore, please replace the Company's May 3 comments with this updated version in the official file for this docket.

In general, National Grid supports the inclusion of the defined terms "Aggregation Owner" and "Verifier" in the regulations. National Grid, however, suggests the following wording changes to the regulations.

First, National Grid believes that the word "may" should be replaced with "shall" in Section 6.8(ii), making it a requirement for a Verifier to seek certification from the Commission. By requiring all Verifiers to seek certification from the Commission, the Commission will ensure that all Verifiers are fully qualified and competent to fulfill their obligations contained in the regulations.² The suggested change in the regulation is marked below:

6.8 (ii) NEPOOL GIS Certificates created by an aggregation shall be monitored and verified by a Verifier. A Verifier shall seek certification from the Commission. A request for certification by a Verifier must demonstrate the Verifier's independence, and describe procedures and qualifications by which the Verifier would fulfill each

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¹ Filed on behalf of The Narragansett Electric Company, d/b/a National Grid.

² The Company notes that Sections 6.8 (iii)(b) and (c) require the Aggregation Owner to provide the qualifications and independence of the Verifier as part of the application for certification of an aggregation. While the Aggregation Owner should have the responsibility to demonstrate independence of the Verifier, it seems more appropriate for the Verifier itself to demonstrate its competency to comply with its regulatory obligations.

of the obligations placed upon the Verifier under Section 6.8(ii) and 6.8(iii)(b),(c)(e) and (g). Nothing in this language is meant to preclude the electric distribution company from being retained as the Verifier, assuming all qualifications contained in Section 6.8(ii) and 6.8(iii)(b),(c) and (e) and (g) are met.

Second, National Grid proposes amendments to the first sentence in Section 6.8(iii)(g) to clarify the language regarding the reporting period entered by the Verifier. The suggested changes are marked below:

6.8 (iii) (g) No less frequently than quarterly, the Verifier shall directly enter into the NEPOOL GIS the quantity of energy production in the applicable time period from each Generation Unit in the aggregation. Such generation data shall not include any generation data from previous time periods, except as provided for in this section. The entry of generation data by the Verifier will be through an interface designated for this purpose by the NEPOOL GIS and in accordance with NEPOOL GIS Operating Rules applicable to Third-Party Meter Readers, and to which the Aggregation Owner shall not have access. Output of less than one MWh by any single Generation Unit within the aggregation may be applied to the entire aggregation's generation, and generation of the aggregation less than one full MWh may be applied to the subsequent quarter in accordance with NEPOOL GIS Operation rules.

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Finally, the draft regulations contain parenthetical brackets in Section 6.8(iii)(e) that are confusing to the Company. It is not clear whether the language in the regulations fully contains the language in the brackets. This should be clarified.

Thank you for your attention to this filing. If you have any questions, please do not hesitate to contact me at (401) 784-7667.

Very truly yours,

Laura S. Olton

cc: Docket 3765 Service List
William Lueker, Esq.
Steve Scialabba, Division

Certificate of Service

I hereby certify that a copy of the cover letter and / or any materials accompanying this certificate has been mailed or hand-delivered to the individuals listed below.



Joanne M. Scanlon

May 4, 2007
Date

National Grid – Docket No. 3765
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