

February 12, 2007

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: 3798 – Renewable Energy Standard Rulemaking**  
**National Grid Responses to Commission Questions**

Dear Ms. Massaro:

After the public hearing on February 8, 2007, the Commission staff kindly requested that National Grid provide responses to the issues raised in the Notice of Rulemaking in the above-captioned docket. Enclosed please find ten (10) copies of National Grid's responses to the Commission's questions.

Question #1: With respect to revised section 6.8(iii)(e):

- a. Should it be the responsibility of the aggregation owner or the Verifier to "ensure that individual units in the aggregation comply with all eligibility requirements"?

National Grid believes the aggregation owner should have the responsibility to ensure that the units are in compliance with the eligibility requirements.

- b. Should it be the responsibility of the aggregation owner or the Verifier to ensure that "the NEPOOL GIS Certificates created accurately represent generation"?

National Grid believes that it is the responsibility of the Verifier to ensure that the generation data being entered into NEPOOL GIS accurately represents the generation that occurred at the generation units.

- c. Under i), should the Verifier in all cases be the entity required to make an independent determination that the Generation Unit exists?

National Grid believes that it is the responsibility of the owner, in the first instance, to provide enough information to the Commission to satisfy the Commission's review. Nevertheless, if it is necessary to have an independent determination that the Generation Unit exists, it seems that the Verifier is the appropriate party to make such determination.

- d. Under v), for “a procedure for the Verifier to report to the commission on the results of their verification process”, should the Commission specify required details regarding frequency, form or content?

Yes, the Commission should establish guidelines that provide details regarding frequency, form or content for the verification process.

Question #2: With respect to new section 6.8(iii)(g):

- a. Should the Verifier be required to enter production data into the GIS independently for each generator within the aggregation, or just in aggregate?

Verifiers should enter this data in aggregate, consistent with the current NEPOOL GIS practice. However, the Verifier should maintain records that support the total values entered into the GIS.

- b. Should the amount of production entered into the NEPOOL GIS be the quantity of energy produced since the last entry, or a cumulative meter reading (which would entail the GIS system calculating the difference between the current and last entry)?

The amount of production entered into the NEPOOL GIS should be the quantity of energy produced since the last entry, consistent with the current NEPOOL GIS practice.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,



Laura S. Olton

cc: William Lueker, Esq.  
Steve Scialabba, Division