

December 11, 2013

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 4465 – Review of 2012 Renewable Energy Standard Annual Compliance Filing**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> I am submitting this response to the Rhode Island Public Utilities Commission's ("Commission") November 25, 2013 letter regarding a possible inaccuracy in the NEPOOL Generation Information System ("NE-GIS") Administrator's records relative to one particular generation facility as it related to the Company's compliance with the Rhode Island Renewable Energy Standard ("RES") set out in R.I.G.L. §39-26-1 et seq.

National Grid, as an Obligated Entity subject to the RES, is allowed to use the NE-GIS reports as the record for demonstrating compliance in its annual compliance filing:

To the extent consistent with the requirements of this chapter, compliance with the renewable energy standard may be demonstrated through procurement of NE-GIS certificates relating to generating units certified by the commission as using eligible renewable energy sources, as evidence by reports issued by the NE-GIS administrator.<sup>2</sup>

The statutory scheme provided in the RES presumes and relies upon the accuracy of the NE-GIS records when determining an Obligated Entity's compliance with its requirements. Similarly, market participants, including the Company, rely upon the accuracy of those records. Absence of certainty and predictability on that point would be antithetical to the orderly administration of the Renewable Energy Standard in Rhode Island and other renewable programs throughout the New England region. Thus, the RES provides that annual compliance filings by Obligated Entities are to be made "within one month after NE-GIS

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company").

<sup>2</sup> R.I.G.L. §39-26-4 (d).

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reports are available for the fourth (4th) quarter of each calendar year.” R.I.G.L. §39-26-6 (a)(4). As the RES provides, the Company’s 2012 RES Annual Compliance Filing incorporates the NE-GIS records, including records regarding the generator in question.

As of the time the Company made its Annual Compliance filing (and in fact to the present time), the certificates from the facility in question were labeled in the NE-GIS records as satisfying the Rhode Island New REC requirements. The Company reasonably based its 2012 RES Annual Compliance Filing (filed on June 28, 2013) on the NE-GIS reports, which are the official records that demonstrates compliance with the Rhode Island RES. R.I.G.L. § 39-26-4(d). Thus, the Company submits that the PUC should find, consistent with this statutory provision, that the Obligated Entity is in compliance with the RES requirements for the 2012 period when it reasonably relies on the official NE-GIS records and when those records demonstrate compliance. Additionally, in terms of going forward, the Company also understands that the NE-GIS Administrator has been notified to correct the system as soon as possible to avoid future errors.

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

Very truly yours,



Thomas R. Teehan

Enclosure

cc: Margaret Janzen, National Grid