



Renewable Portfolio Standard (RPS) Certification with The NEPOOL Generation Information System (GIS):

The process outlined below is for the registration and management of Renewable Energy Credits (RECs) produced by the NEB projects in the BHD district developed by a collaboration of ReVision Energy Inc., Central Maine Power Company, and Versant Power that jointly filed the following comments as a recommended REC management workflow for projects engaged in Maine's Net Energy Billing Tariff Rate program (governed by 35-A MRSA §3209-B, and MPUC Chapter 313 §3(K)). In the BHD district, the NEPOOL Generation Information System (GIS) will be utilized.

For a renewable generation unit ("Unit") where the independent power producer ("Owner") will serve as the Responsible Party, the Owner shall directly manage the REC registration process in its entirety.

However, for a Unit where Versant Power will serve as the Responsible Party, the following shall apply:

1. Within 10 business days following the commercial operation date of the Unit, Versant Power will contact the Unit Owner to determine whether the Unit will 1) accept REC transfers from Versant Power and self-manage RECs, or 2) retire RECs. The Unit Owner shall provide a response and establish a NEPOOL-GIS account (as applicable) within 20 business days following the contact.
The Unit Owner will need it's own GIS account whether they are the Responsible Party or not
2. For any Unit that reaches commercial operation in a given month, within the first 5 business days of the following month Versant Power shall submit registration materials to the MPUC for the Unit's participation in the ME RPS Class 1A/1/2 (as applicable) program. As part of this registration submission, Versant Power shall make publicly available a spreadsheet containing, at minimum, the following information:

- a. GIS Account Holder Name

- b. Plant Name – Unit Name
 - c. Address
 - d. Fuel Type
 - e. Capacity (MW AC)
 - f. Initial Commercial Operation Date
 - g. NEPOOL-GIS ID (Generator Asset ID assigned by ISO-NE)
3. Within 20 business days following the asset entry into NEPOOL GIS, the T&D Utility will:
- a. For a Unit electing to accept REC transfers from the T&D Utility and self-manage RECs, establish an automatic forward transfer of all minted RECs for the duration of the Net Energy Billing Agreement to a NEPOOL-GIS account of the Owner's choosing.
 - b. For a Unit electing to retire RECs, create a retirement sub-account in NEPOOLGIS and establish an automatic forward transfer of all minted RECs for the duration of the Net Energy Billing Agreement to the retirement sub-account.
 - c. For all Units, begin monthly generation reporting to NEPOOL-GIS, including any historical generation dating back to the Unit's commercial operation date.
4. For a Unit electing to accept REC transfers from the T&D Utility and self-manage RECs, to facilitate cross-qualification registrations for other state RPS programs performed by the Owner, the T&D Utility and Owner shall collaborate in good faith to assist with adhoc tasks. These include, but are not limited to:
- a. Notify and confirm with Owner when state RPS program registration approvals are reflected in the T&D Utility's NEPOOL-GIS account; and
 - b. Provide authorization letters to state RPS program administrators to allow Owners to cross-qualify the Unit (e.g. MA DOER).

The following explanation and context for the different steps is provided solely for informational purposes:

- A project must achieve commercial operation and have its revenue quality meter and phone line installed and tested before the T&D Utility may submit the ISO-NE wholesale market registration materials. Once these are submitted to ISO-NE, the ISO has 5

business days to accept the registration, issue notice to the T&D Utility of the official start date for reporting generation, and assign the Generator Asset ID.

- Once the ISO-NE wholesale market registration is processed, the Unit will be assigned a Generator Asset ID by ISO-NE. With this Generator Asset ID in-hand, the T&D Utility has all information needed to submit the ME RPS Class 1A/1/2 registration materials to the MPUC. The timing of this submission by the T&D Utility to the MPUC is outlined in bullet 2 above.
- Additionally, following a Unit's wholesale market registration completion with ISO-NE, NEPOOL-GIS will create a unit record within the NEPOOL-GIS registry (also referred to as "asset entry"). This unit creation typically occurs in the calendar month following the Unit's wholesale market registration effective date.
- For context on 4b above, the MA DOER (administrator of Massachusetts' RPS program), requested a simple, blanket authorization from the Maine T&D Utilities clarifying the structure of the C&I Tariff NEB program and the utilities' role in the REC workflow. CMP has provided this letter (attached for reference), and Versant intends to do so, as well.

Accessing the GIS Registry User Guide with the link below will help to determine what kind of GIS account is required and how to register.

<https://nepoolgis.zendesk.com/hc/en-us>

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