## MEMORANDUM

**TO:** NEPOOL Markets Committee

**FROM:** Paul N. Belval, NEPOOL Counsel

**DATE:** October 9, 2024

**RE:** Request for Referral of Proposed GIS Change to the GIS Working Group

Massachusetts Eligibility Functionality

At its October 16, 2024 meeting, the NEPOOL Markets Committee will be asked to direct the NEPOOL Generation Information System ("GIS") Operating Rules Working Group (the "Working Group") to consider potential changes to the GIS to add information to certain GIS Certificates regarding when a facility became eligible under Massachusetts clean, alternative and renewable energy standards. This change was requested by the Massachusetts Department of Energy Resources ("MA DOER").

Currently, Appendix 2.4 of the GIS Rules provides for each Certificate for a facility qualified for a state renewable, clean or alternative energy standard to include a field in which that generator became qualified, and that field is used by certain New England sates. APX, the GIS Administrator, has reported that when the GIS was first activated, however, the functionality to include that information on Certificates for Massachusetts-eligible facilities was not part of the original design, and Massachusetts tracked that information independently. The MA DOER has now asked to include that information on Certificates issued for facilities that are qualified for the Massachusetts Renewable Portfolio Standard, Alternative Energy Standard, Solar Carve-Out, Clean Energy Standard and Clean Peak Standard.

The requested changes to the GIS will not necessarily require a change to the GIS Operating Rules. As in the past, however, we presume that the Markets Committee would still prefer that the Working Group consider these changes, and the potential cost to NEPOOL to implement them, and provide a recommendation to the Markets Committee before the Markets Committee votes on the changes.

The Markets Committee is not being asked to approve any changes to the Rules or the GIS at this time. Rather, it is only being asked to refer the change outlined above to the Working Group for further discussion and possible consideration of a potential changes to the Rules and/or the GIS that would later be returned to the Markets Committee for a vote. Of course, if the Markets Committee decides to refer this issue to the Working Group, any input on the issue at this time would be appreciated, as it may help direct the Working Group's discussions.

cc: NEPOOL GIS Operating Rules Working Group