

MEMORANDUM

TO: NEPOOL Markets Committee

FROM: Paul N. Belval, NEPOOL Counsel

DATE: December 2, 2024

RE: Request for Referral of Proposed GIS Change to the GIS Working Group
Vermont Renewable Energy Standard Revisions

At its December 10, 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 change to the GIS and the GIS Operating Rules (the “Rules”) to reflect the addition of a new tier of resources to the Vermont Renewable Energy Standard (“VT RES”). This change was requested by the Vermont Public Utility Commission (“VT PUC”).

Vermont Public Act No. 179 makes several changes to the VT RES, including the creation of a new “Tier 4” of renewable energy sources, which are renewable energy plants coming into service after January 1, 2010 whose energy is capable of delivery in New England, but excluding hydroelectric generation plants with a capacity of 200 MW or greater.¹ The change requires that Tier 4 be added as a VT RES designation on GIS Certificates in Part 2 of Appendix 2.4 to the GIS Operating Rules. Certain electric providers in Vermont can begin using Certificates for Tier 4 resources effective January 1, 2025. Certificates for the first quarter of 2025 will be created on July 15, 2025, so the VT PUC has requested that the changes to the GIS and the Rules become effective on July 1, 2025.

The changes to the GIS related to Hourly Tracking that were approved by the Participants Committee at its September 2024 meeting are expected to consume all 500 development hours for 2025 that are included in the amounts paid by NEPOOL to APX, Inc., the GIS Administrator. Accordingly, APX’s development work associated with the change requested by the VT PUC will be charged to NEPOOL at the rate of \$180/hour. Under Rule 1.3(a), because the requested change is “an amendment to the GIS Operating Rules or a modification to the GIS that is required to address a change in law,” the Markets Committee could approve this change when it is returned to the Markets Committee for a vote, without the need for further action by the Participants Committee. We will include APX’s estimate of the number of hours needed to implement this change when the matter returns to the Markets Committee for a vote.

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

¹ See 30 V.S.A. § 8005(a)(4); see also 30 V.S.A. § 8002(17).

Group for further discussion and possible consideration of a potential change 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