

MEMORANDUM

TO: NEPOOL GIS Operating Rules Working Group

FROM: Samantha Regan and Paul Belval, NEPOOL Counsel

DATE: August 30, 2023

RE: Meeting of the GIS Operating Rules Working Group to Discuss Open Matters to be Referred to the NEPOOL Markets Committee

A meeting of the GIS Operating Rules Working Group (the “Working Group”) is scheduled for September 8, 2023 from 1:00-3:00 PM EST to consider GIS enhancements and Rule changes referred to the Working Group by the NEPOOL Markets Committee. Below is an outline of items to be discussed and, where available, an estimate of the development hours that APX, the GIS Administrator, believes will be needed to complete the changes to the GIS. Please note that the fees paid to APX by NEPOOL under the GIS Administration Agreement includes up to 500 development hours per year for modifications to the GIS. No development hours have been used for 2023.

I. Show Password Screen

This proposed enhancement would add the “Show Password” option to all screens where password entry is required (i.e., would allow users to view their password as entered into the password field). This would add the “Show Password” option to the “Forgot Password,” “Activation” and “Change Password” screens of the GIS. This change was requested by a member of the GIS Usability Group at a quarterly meeting of that group. APX estimates that implementing these changes in the GIS would take 15 development hours. This change would not require a change to the GIS Operating Rules.

II. Massachusetts CPEC Public Report

This proposed enhancement would add a new Massachusetts Clean Peak Energy Certificate (“CPEC”) public report to the GIS. The proposed enhancement would create a new report with CPEC issuance data detailing the number of CPECs issued during each relevant period under the Massachusetts Clean Peak regulations. This new report will default to report aggregate CPECs by vintage quarter. This change was requested by a member of the GIS Usability Group at a quarterly meeting of that group. APX estimates that implementing these changes in the GIS would take 90 development hours. This report falls within the types of reports contemplated by Rule 5.4(e) and therefore would not require a change to the GIS Operating Rules.

III. API Functionality

This proposed enhancement would add additional functionality to the existing NEPOOL GIS Application Program Interface (“API”) for meter data reporting. This enhancement would add “Meter Upload Project List” and “Post Meter Data Upload Actions” to the existing NEPOOL GIS API to facilitate meter reporting for multiple projects and would allow for the generation of a report via the NEPOOL GIS API. The proposal would be to make this API functionality available to non-NEPOOL Participants, which would require a change to Rule 3.9(b). Attached as Appendix A are proposed Rule changes to effectuate this change. Please note that separate fees are no longer charged to API users, as described in the current version of Rule 3.9(b). APX estimates that implementing these changes in the GIS would take 133 development hours.

IV. Hourly Certificates

These proposed Rule changes requested by Constellation Energy Generation, LLC, were referred to the Working Group by the Markets Committee in August 2022. The requested changes would accommodate the transfer of Certificates on an hourly basis through a separate register maintained by APX and permit Account Holders to identify certain generators for which the generation data in the GIS would be denoted hourly in that register, on an opt-in basis. Attached as Appendix B are proposed Rule changes to effectuate the changes contemplated by Constellation’s request.

Due to the size of this proposal, APX has not provided an estimate for implementing these changes in the GIS. However, APX has noted that this would be a very large project—certainly in excess of the 500 annual development hours for NEPOOL, and may be up to 2,000 development hours or more. Gathering more detailed estimates will be a large effort by itself.

APPENDIX A

Rule 3.9 Account Management Alternatives

(a) If an Account Holder elects to access and manage its GIS account and subaccounts through one or more third-party account management services approved by the NEPOOL Markets Committee from time to time, then: (1) the actions described in this Part 3 relating to the Account Holder's GIS account and subaccounts shall take place through that account management system and not through the GIS; (2) the functionality described in this Part 3 will be disabled in the GIS user interface and will be performed exclusively in that account management system for that Account Holder; and (3) all other functions pertaining to the Account Holder's GIS account and subaccounts will still occur through the GIS user interface.

(b) In addition, an Account Holder ~~that is also a NEPOOL Participant, an ISO Market Participant, one of the Energy Regulatory Agencies listed in Appendix 5.3 or the CPS Program Administrator~~ may access the GIS through an application programming interface ("API") approved by the NEPOOL Markets Committee and made available to all ~~such~~ Account Holders by the GIS Administrator. ~~Any Account Holder accessing the GIS through an API (other than one of the Energy Regulatory Agencies listed in Appendix 5.3 or the CPS Program Administrator) will pay any fee for such access as is established from time to time by the NEPOOL Participants Committee, subject to the provisions of Rule 2.2(a) for non-Participant Account Holders that are subject to such a fee.~~

APPENDIX B

Rule 2.2 Account Holder Registration

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(l) A NEPOOL Generator that is also a Zero Emissions Generator, or an Importing Account Holder importing Imported Unit Energy from a Zero Emissions Generator, may opt to have the Certificates for its generation in any calendar month denoted as being tracked in the Hourly Generation Ledger, as described in Rule 2.9. Such Certificates are referred to as “Hourly Claim Certificates,” and the NEPOOL Generator or Importing Account Holder receiving Hourly Claim Certificates shall be referred to as an “Hourly Claim Generator”. Hourly Claim Certificates shall be denoted in full MWh, as with other Certificates. Hourly Claim Certificates will be issued, in accordance with Rule 2.9 and transferred in accordance with Rule 3.1(b).

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Rule 2.9 Hourly Claim Certificates

(a) Each Account Holder opting to claim the hourly output of its eligible NEPOOL Generator or Imported Unit Energy and have Hourly Claim Certificates issued for that eligible NEPOOL Generator or Imported Unit Energy for a specific calendar month shall notify the GIS Administrator at least five (5) days prior to the start of that month, which notice shall apply to all subsequent calendar months unless and until that Account Holder notifies the GIS Administrator that it no longer wishes to receive Hourly Claim Certificates for that GIS Generator or Imported Unit Energy, which notice shall also be given at least five (5) days prior to the start of the month for which Hourly Claim Certificates are not to be issued.

(b) Monthly generation data for an Hourly Claim Generator must meet all requirements of these Rules. The hourly breakdown of that monthly generation data must be provided directly to the GIS Administrator via a secure internet portal by either (1) the regional transmission organization or independent system operator (as recognized by the Federal Energy Regulatory Commission) that covers the area in which such generating unit is located (including ISO-NE for NEPOOL Generators), or (2) an electric utility metering the generation of such generating unit, or (3) a nationally recognized renewable energy credit tracking system, or (4) a Third Party Meter Reader meeting the requirements of Rule 2.5(j). The GIS Administrator will keep a separate ledger of the generation data for each such Hourly Claim Generator for each month in which it is an Hourly Claim Generator (the “Hourly Generation Ledger”). Generation data shall be recorded in the Hourly Generation Ledger in thousandths of a MWh. The GIS Administrator shall not create Hourly Claim Certificates or record generation in

the Hourly Generation Ledger for any hour for which it has not received hourly generation data as provided above.

(c) Each Hourly Claim Certificate shall include a notation that it is an Hourly Claim Certificate and the generation represented by that Certificate is registered in the Hourly Generation Ledger maintained by the GIS Administrator, as provided in Part 12 of Appendix 2.1. Except for such notation on each Hourly Claim Certificate, Hourly Claim Certificates shall be created and issued in the same manner as all other Certificates.

Rule 3.1 Transfers Among Account Holders

(a) Except as otherwise provided in these Rules, Account Holders may transfer Certificates to other Account Holders pursuant to a Forward Certificate Transfer (defined below) or at any time during a Trading Period (defined below). Account Holders transferring such Certificates shall reflect such transfer in the GIS by indicating in a designated screen in the GIS that such Certificate has been transferred and selecting the transferee. The designated transfer screen shall include a field for price information and a free-form text field for the transferor to use in identifying the transfer transaction, which fields shall also only be visible to the GIS Administrator and the transferee and which fields may be left blank in any transfer. In turn and in a similar fashion, the Certificate transferee shall confirm the transfer in a designated screen in the GIS. If the transfer includes Hourly Claim Certificates as described in Rule 3.1(b), the date and hour of the generation represented by those Hourly Claim Certificates shall also be included in the designated transfer screens. Subject to any restrictions for Forward Certificate Transfers described in Rule 3.3, the transferring Account Holder may cancel any Certificate transfer before such transfer has been confirmed by the transferee by withdrawing the transfer in a designated screen in the GIS. The transfer of any Certificate shall only be registered in the GIS upon the electronic notification by both the transferor and the transferee. Account Holders may designate one or more agents for purposes of transfers and acceptances of transfers of Certificates by creating logins for them.

(b) In any transfer of Hourly Claim Certificates, the transferring Account Holder shall include in the transfer request the date(s) and hour(s) of the generation associated with such Hourly Claim Certificates. Prior to the transfer screen becoming available to the transferee for confirmation, the GIS Administrator will confirm in the Hourly Generation Ledger that such generation does not exceed the uncommitted generation (i.e., generation that actually occurred and is not associated with Hourly Claim Certificates subject to another pending or accepted transfer request) of the applicable Hourly Claim Generator for the specified date(s) and hour(s). Upon confirmation of the transfer by the transferee, the GIS Administrator shall record the transfer in the Hourly Generation Ledger. In the event that the sum of the generation included in a single transfer request for Hourly Claim Certificates does not result in whole MWhs being transferred, the number of Hourly Claim Certificates transferred in response

to such transfer request will in each case be rounded down to the next lower number of whole MWhs.

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Rule 3.3 Forward Certificate Transfers

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(b) In the registration of a Forward Certificate Transfer, the GIS Generator or Importing Account Holder registering that transfer shall indicate (in addition to the requirements in Rule 3.1) (1) the GIS Generator or Importing Account Holder that will create such Forward Certificates, (2) the months or Trading Period(s) to which the Forward Certificate Transfer relates (which may be a single month or Trading Period or a specific number of Trading Periods, as designated in the registration), (3) the maximum number of Forward Certificates to be transferred, or the percentage of total Certificates actually created that will be transferred, during each such month or Trading Period, (4) whether, as a result of Massachusetts vintage requirements, a certain number of Certificates must be created in any calendar year before the Forward Certificates to be transferred will be created, and, if so, the number of such Certificates in each indicated calendar year, and (5) whether the transferor has the ability to rescind the Forward Certificate Transfer prior to the creation of the Forward Certificates. For a Forward Certificate Transfer of Hourly Claim Certificates, the GIS Generator or Importing Account Holder registering the transfer may only indicate a percentage of total Hourly Claim Certificates to be transferred in that Forward Certificate Transfer, and that percentage will be applied to the generation in every hour of the month or Trading Period to which the Forward Certificate Transfer relates. For Reserved Certificate and export transactions, the transferor shall transfer the number or percentage of Forward Certificates to the specially designated accounts for Reserved Certificate transfers and exports in the same fashion as those transfers are effected presently under Rules 3.5 and 3.6, respectively. Neither NEPOOL nor the GIS Administrator, nor the ISO shall have any liability if some or all of the Forward Certificates to be transferred are not created during any applicable Trading Period because of an outage of the GIS Generator or importing generating unit, failure to dispatch the GIS Generator or importing generating unit, failure of an Importing Account Holder to satisfy the requirements of Rule 2.7, or any other reason beyond the reasonable control of NEPOOL, the GIS Administrator or the ISO. Once the Forward Certificate Transfer is registered in the GIS, such Forward Certificates, when converted into Certificates on their Creation Date, will be deposited directly into the account of the transferee, and the transferor will not at any point have possession of those Forward Certificates. The GIS Administrator will notify each transferor when its Forward Certificate Transfer has been registered in the GIS. Any exercise of a contractual right of rescission of a Forward Certificate Transfer by a transferor shall be effected upon notice to the GIS Administrator from the transferor (without confirmation by the transferee), and in no event will the GIS Administrator be required to determine

whether conditions to that rescission, other than receipt of the rescission notice, have been satisfied before effecting the rescission.

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Rule 3.5 Reserved Certificates

- (a) Account Holders may sell Certificates directly to third parties in good faith, arm's length transactions for reasonable value, independent of transactions involving Energy between those purchasers and their Retail LSEs (Certificates sold in such transactions are referred to herein as "Reserved Certificates.") To avoid the possibility of double counting Certificates, each Account Holder that sells a Reserved Certificate shall, at the time of such transfer, transfer such Reserved Certificate in the GIS to a specially designated Reserved Certificate account using the procedure described in Rule 3.1 and, for a Forward Certificate Transfer of Reserved Certificates, the procedure described in Rule 3.3 (but without confirmation by the transferee). Each Account Holder may designate one or more subaccounts within the Reserved Certificate account. Transactions involving Reserved Certificates are limited to Certificates (other than Clean Peak Energy Certificates) representing MWhs (A) generated or to be generated by a Zero Emissions Generator or (B) generated or to be generated using a fuel source that is designated as being eligible for such transactions on Appendix 2.4 hereto (except as otherwise provided in these Rules) ("Renewable Certificates"), it being the intent of this Rule that Fuel Sources identified in Part 1 of Appendix 2.4 that are defined as "renewable" (i) by any Attribute Law or (ii) by any statute, regulation or order or decision of a governmental agency of a New England state with respect to eligibility for monies from a state renewable energy fund would be considered Renewable Certificates. A Reserved Certificate may be returned from the Reserved Certificates account to the Account Holder transferring it at any time during the Trading Period for that Certificate if the underlying sale of such Certificate to a third party has not been effectuated. At the end of such Trading Period, all Reserved Certificates in the Reserved Certificate account shall be retired and shall no longer be available for further transfer, and their attributes shall not be included in any Residual Mix Certificates.

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Rule 4.1 Retail LSE Obligations, Accounts and Subaccounts

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- (e) Retail LSEs may hold Certificates in their Default Subaccounts without assigning them to any other Retail Subaccount. APS Certificates may be held in a Retail LSE's Retail Subaccount without being matched to that Retail LSE's Certificates Obligation. Clean Peak Energy Certificates shall be held solely in a

Retail LSE's subaccount specifically designated for those Clean Peak Energy Certificates, and no Certificates that are not Clean Peak Energy Certificates will be held in such a subaccount. [Hourly Claim Certificates may not be transferred into or held in a Retail Subaccount.](#)

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Rule 5.2 Reports for Account Holders

(a) The GIS Administrator will furnish electronically to each registered Account Holder quarterly and annual reports that aggregate by MWh the various Certificate fields listed on the Certificates owned by such Account Holder for such reporting period. [Information regarding Hourly Claim Certificates may be provided in a separate report.](#) Quarterly reports shall be provided by the 5th day after the close of a Trading Period, and annual reports shall be produced by June 20 of the year following the year to which the report applies. Annual reports shall include amounts for the generation occurring and Certificates Obligations arising during the applicable calendar year and shall include Certificates transactions that occurred during the portions of the Trading Periods that occurred following the end of such calendar year. Account Holders may view only data for their individual accounts and subaccounts.

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Rule 5.3 Reports for Regulatory Agencies and ISO

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(b) Each report provided to the Regulators and the ISO shall include the following information:

- (i) List of GIS Generators identified by name, date commercial operations were commenced, and date of any repowering and/or capacity addition, categorized by fuel source, [with Hourly Claim Generators during the applicable period specifically designated;](#)

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- (vi) Total number of Certificates created during the reporting period (with APS Certificates, NH Class I Thermal Certificates, NH Biodiesel Producer Certificates, Maine Thermal Certificates ~~and~~, Conservation Certificates [and Hourly Claim Certificates](#) accounted for separately);

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(xxv) Subject to Rule 5.3(d) below, list of GIS Generators identified by (A) name, (B) location, (C) date commercial operations were commenced, (D) date of any repowering and/or capacity addition, (E) fuel source, (F) eligibility under state renewable portfolio standards, alternative energy portfolio standards, clean energy standards or clean peak standards (as reflected in Part 2 of Appendix 2.4), (G) asset identification number, (H) total generation or conservation, in MWh, for the reporting period, ~~and~~ (I) whether generation or conservation data included in that report was provided to the GIS Administrator by a Third Party Meter Reader and the identity of any Third Party Meter Reader providing such data; and (J) whether each GIS Generator was an Hourly Claim Generator during the applicable reporting period (the information described in items (G), (H) and (I) of this Section 5.3(b)(xxv) is referred to as “Protected Generator Information”);

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(xxviii) Total number of SREC-II Ineligible Certificates created during the reporting period; ~~and~~
(xxix) Total number of Clean Peak Energy Certificates created during the reporting period; ~~and~~
(xxx) Total number of Hourly Claim Certificates created during the Reporting Period, reported separately for NEPOOL Generators and Importing Account Holders.

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Rule 5.4 Publicly Available Reports

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(e) The publicly available reports posted on the GIS Administrator’s website shall include an aggregation and/or average, as appropriate, of the Certificate fields for all Certificates created during the quarterly or annual reporting period. Such reports shall aggregate data separately for NEPOOL Generators, Importing Account Holders, Non-NEPOOL Generators, Included Generators, C&LM Resources, BMG Resources, Class III Cogeneration Resources, DR Resources, MAPS CHP Resources, MAPS Useful Thermal Resources, NH Useful Thermal Resources, NH Biodiesel Producers, Maine Thermal Resources, Clean Peak Resources ~~and~~, Non-NEPOOL Generator Representatives and Hourly Claim Generators, and shall also include data aggregated for all GIS Generators and Importing Account Holders and data aggregated by originating control area (if other than ISO New England) and RPS or APS eligibility for all Imported Unit Energy. Those reports shall include the aggregate and/or average, as appropriate, of the Certificate fields for all Residual Mix Certificates, all Reserved Certificates, all Certificates assigned to state-specific subaccounts and all

Certificates associated with Energy exported from the New England for the quarterly or annual reporting period as well. Those reports shall also include a listing of all Third Party Meter Readers for the time period covered by each such report and the number of Certificates issued using the RSIP Estimation Methodology during the time period covered by each such report. In addition, those reports shall be capable of being sorted by the state of origination and settlement, by eligibility for RPS and APS programs, and by fuel type for all such Certificates for the time period covered by each such report.

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(h) In addition to the other reports provided for under this Rule 5.4, at the start of each Trading Period, the GIS Administrator will post in a publicly available portion of the GIS website the following information for the three-month period applicable to such Trading Period:

- (i) GIS Generators names and locations;
- (ii) Total number of Certificates created in such Trading Period;
- (iii) Total Energy imported into the New England Control Area by state or control area, aggregated by RPS or APS eligibility;
- (iv) Total Energy exported from the New England Control Area: ~~and~~
- (iii) Total Certificate Obligations for such Trading Period~~;~~
- (iv) [Total Hourly Claim Certificates created in such Trading Period, reported separately for NEPOOL Generators and Importing Account Holders; and](#)
- (v) [Total Hourly Claim Certificates transferred in such Trading Period, reported separately for NEPOOL Generators and Importing Account Holders.](#)

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Appendix 2.4

GIS Certificate Fields¹

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Part 12 –Hourly Claim Certificate with the generation represented by that Certificate registered in the Hourly Generation Ledger maintained by the GIS Administrator (yes/no)

¹ Fields identified with an asterisk (*) will not change.