

To the NEPOOL GIS Operating Rules Working Group-

The Working Group will meet via Zoom on **Thursday March 28 from 10 am to 11 am** to resume its discussion of a requested change to the GIS Operating Rules related to data reporting requirements for imported energy. The issue, which was raised by Vermont Electric Power Company (“VELCO”), is described in the attached memo to the NEPOOL Markets Committee and the attached memo from VELCO to the Working Group. Specifically, VELCO asked that the Operating Rules be changed so that Importing Account Holders must only submit generation information for their contracted portion of a generating unit importing Energy into ISO-NE, rather than information for the entire output of that unit.

The Working Group last discussed this issue in December 2022. At that time, the Working Group asked the Vermont Public Service Department (“VPSD”) to contact the New York Power Authority (“NYPA”) to ask what information it could provide to the GIS and the New England regulators with respect to the hourly output from the two generating units for which VELCO seeks unit-specific Certificates. The VPSD has since reached out to NYPA, and NYPA has confirmed that the total hourly generation for the entire contract is proprietary information that they are unable to share due to concerns about their position in the NYISO marketplace. Moreover, the contract does not require sharing of this data.

I will circulate a Zoom invite for the meeting shortly.

Paul

MEMORANDUM

TO: NEPOOL Markets Committee

FROM: Samantha Regan, NEPOOL Counsel

DATE: November 2, 2022

RE: Request for Referral to GIS Operating Rules Working Group
Data Reporting for Imported Energy in the GIS

At its November 9, 2022 meeting, the NEPOOL Markets Committee (the “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 Operating Rules (the “Rules”) relating to a change to data reporting requirements for imported energy Certificates under Rule 2.7(c)(x). These changes were requested by NEPOOL Participant Vermont Electric Power Company, Inc. (“VELCO”).

Currently, Rule 2.7(c) requires that, in order to receive unit-specific GIS Certificates for energy imported into the ISO-NE area, generation data must be provided directly to the GIS Administrator by either (1) the regional transmission organization or independent system operator that covers the area where the generating unit is located, (2) an electric utility metering the generation of such generating unit, (3) a nationally recognized renewable energy credit tracking system, or (4) a Third Party Meter Reader. VELCO states, however, that for Account Holders that only have access to a portion of total hourly generation for the generation unit, it is often difficult to access generation data for the entirety of the generation unit. Instead, VELCO suggests that the Rules provide that Account Holders must only submit received generation for their contracted portion of a generating unit for imported energy.

The Markets Committee is not being asked to vote on any changes to the Rules at this time. Rather, the Markets Committee is only being asked to refer the issues outlined above to the Working Group so that the Working Group can further discuss and determine the Rule revisions needed if the Working Group supports the proposal. Of course, if the Markets Committee decides to refer these issues to the Working Group, its input at this time would be appreciated, as it may help direct the Working Group’s discussions.

cc: NEPOOL GIS Operating Rules Working Group



To: GIS Working Group
From: VELCO Power Accounting Department
CC: State of Vermont & MMWEC

Date: 1/12/2023

Subject: Summary of VELCO's Request to change GIS Import Rules

Problem: In working towards the Q2 NEPOOL GIS import meter data submission for unit-specific claims (Niagara & St. Lawrence), VELCO encountered a problem in regards to the submission requirements. To receive unit-specific RECs, VELCO is required to submit the total hourly project generation. VELCO only has access to its portion of the total hourly generation.

GIS Import Rules: The source of the meter data should be 1 of the 4 sources below:

- 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
- an electric utility metering the generation of such generating unit
- a nationally recognized renewable energy credit tracking system
- a Third Party Meter Reader meeting the requirements of Rule 2.5(j) of the NEPOOL GIS operating rules

Efforts to resolve: We reached out to NYPA to request they provide us with the total hourly generation for the entire contract, and were told "it is proprietary information and they cannot share it". We also reached out to NYISO and received a similar response. We reached out to ISO-NE Participant Support and received the following response "Niagara Power and St. Lawrence-FDR projects are import resources in ISO New England. We do not have the values you require."

Temporary solution for Q2 Submission: Our temporary solution was reaching out to MMWEC to obtain their data, as they are the other party to the contract. This required a lot of time and effort for both parties. In talking with the NEPOOL GIS administrator, who was extremely patient, helpful and understanding of the circumstances we were in, we were able to submit the combined (total) hourly generation, so the Vermont DU's could receive the appropriate Tier 1 credit due. At this point in time, we have no other way of obtaining the total project generation, or having anyone else submit it to NEPOOL GIS.

GIS Working Group Meeting: NEPOOL GIS process for claiming imported unit-specific RECs: VELCO brought this problem to the 'GIS Operating Rules Working Group' (Memo attached) to create a resolution, allowing VELCO to not be required to obtain NYPA's total generation by project. In doing so, they asked if a knowledgeable representative from the State of Vermont and MMWEC could attend the next meeting in regards to this matter. TJ Poor and Matthew Ide were the representatives who were requested attend the meeting the week of December 5th.

Status of Request: VELCO has requested the following change – the rules provide that Account Holders must only submit received generation for their contracted portion of a generating unit for imported energy. The State of Vermont was going to reach out to NYPA on an agreement to confidentially provide information every quarter for import reporting requirements. The GIS Working Group approves of VELCO and MMWEC proceeding with the temporary solution on an ongoing basis.

To the NEPOOL GIS Operating Rules Working Group:

We would like to add a discussion of the estimate needed to develop the hourly tracking proposal to the agenda for our Working Group meeting on March 28 at 10 a.m. We would have that discussion after we discuss the issue raised by Vermont Electric Power Company related to unit-specific Certificates for imported energy representing a portion of the output of a generating unit. That issue was described in an email to the Working Group last week.

With respect to the hourly tracking hours estimate, the Working Group met on February 9 to discuss the requirements for hourly tracking changes in the GIS, and APX agreed to produce the attached estimate of development hours needed to implement those requirements.

At that same meeting, the Working Group discussed APX's estimate of the hours needed to implement two sets of changes proposed by the GIS Usability Group last year (the "Q3 2023 Enhancements"). The first Q3 2023 Enhancement would add functionality to the Clean Peak Resources registration screen to allow users to bulk upload Clean Peak Resources data simultaneously. The second Q3 2023 Enhancement would update the NEPOOL GIS Application Program Interface ("API") password change requirements to have the system send users an automated reminder prior to password expiration. APX estimated it would require 434 hours to implement both Q3 2023 Enhancements, as described in the attachment. NEPOOL receives up to 500 development hours per year for GIS enhancements under its contract with APX, and APX proposed to use the remaining 262 unused hours from 2023 for the Q3 2023 Enhancements. The remaining 172 hours would come from 2024's allotment of 500 development hours.

At the February 9 meeting, the Working Group decided to defer any further discussion of the Q3 2023 Enhancements until it reviewed the hours estimate for the hourly tracking changes so that it could consider prioritizing the different changes. In the attached estimate, APX has proposed two options – one where all the remaining unused development hours for 2023 are applied to the Q3 2023 Enhancements, and a second where those 2023 hours are applied to the hourly tracking changes instead.

Under Rule 1.3 of the GIS Operating Rules, changes to the GIS that require 50 hours or more of labor or have an estimated cost to NEPOOL of more than \$30,000 and that in either case are not required to address a change in law or a change in the ISO Tariff must be approved by the NEPOOL Participants Committee after a recommendation by the NEPOOL Markets Committee. So depending upon how these various changes proceed, the changes may require approval of the Participants Committee.

I had circulated the calendar invite with the Zoom link for the meeting last week. Please let me know if you would like me to resend that invite to you.

Thanks

Paul

Hours Estimate for Hourly Tracking Changes

The total estimate for the Hourly Certificate is **1,245 hours**.

The tables below outline the scope breakdown and estimates for the Hourly Tracking requests. Please note that the Hourly Clean Energy tracking for Import Projects hours listed in the Scope Breakdown was not part of the original solution we reviewed. We estimated those hours per the Working Group's request during the last Working Group meeting.

Scope Breakdown
1. Hourly Clean Energy tracking for wholesale ISO-NE generators. (935 Hours)
2. Hourly Clean Energy tracking for Import Projects (310 Hours)

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Initial Project Estimate Option 1:	
Total Estimated Implementation Hours	1245
Remaining 2024 Non-Billable Project Hours before estimate: 500 Remaining 2024 Non-Billable Project Hours after estimate: 0	(500)
Additional Billable Hours	745
Hourly Rate	\$180.00
Total Estimated Implementation Cost	\$134,100.00
Initial Project Estimate Option 2:	
Total Estimated Implementation Hours	1245
Remaining 2024 Non-Billable Project Hours before estimate: 500 Remaining 2024 Non-Billable Project Hours after estimate: 0	(500)
Remaining 2023 Non-Billable Project Hours before estimate: 262 Remaining 2023 Non-Billable Project Hours after estimate: 0	(262)
Additional Billable Hours	483

Hourly Rate	\$180.00
Total Estimated Implementation Cost	\$86,940.00

As discussed previously, there are 262 hours remaining from 2023. We plan to apply the hours to the Q3 2023 Usability Group enhancements, if the NEPOOL MC approves those enhancements. However, if the NEPOOL MC prioritizes the Hourly Tracking work over the Q3 2023 Usability Group Enhancements, we can apply the 262 remaining hours from 2023 to the Hourly Tracking estimates outlined in Option 2, if NEPOOL selects that option.

Hours Estimate for Q3 2023 GIS Enhancements

The estimate for the Q3 2023 GIS Usability Group Enhancement Requests is **434** hours. The tables below outline the estimates and scope breakdown for the two Usability Enhancement requests.

Initial Project Estimate	
Total Estimated Implementation Hours	434
Beginning 2023 Non-Billable Project Hours: 500	262
Remaining 2023 Non-Billable Project Hours: 262	
Remaining 2023 Non-Billable Project Hours after estimate: 0	
Beginning 2024 Non-Billable Project Hours: 500	172
Remaining 2024 Non-Billable Project Hours after estimate: 328	
Hourly Rate	\$180.00
Total Estimated Implementation Cost	\$0.00

Scope Breakdown
1. CPS Resource Batch Upload (424 Hours)
2. API Password Update (10 Hours)

We currently have 262 hours left for 2023. If these Q3 2023 Usability Group Enhancements are approved, we can use the remaining 2023 hours plus the 2024 hours for these enhancements.