

# STATE OF NEW HAMPSHIRE

## Intra-Department Communication

**DATE:** June 16, 2020

**AT (OFFICE):** NHPUC

**FROM:** Deandra Perruccio, Sustainable Energy Analyst

**SUBJECT:** REC 20-79, Ryegate Associates and ENGIE Resources LLC Request for Waiver of Puc 2503.03 (d)  
**Filing of Connecticut PURA Motion No. 1 Approval and ENGIE Certification Regarding Ryegate RECs**

**TO:** Debra A. Howland, Executive Director

**CC:** Karen P. Cramton, Director, Sustainable Energy Division  
David K. Wiesner, Director, Legal Division

On May 28, 2020, the Commission granted a limited waiver of the otherwise applicable RPS compliance documentation requirement set forth in N.H. Admin. R., Puc 2503.03(d) to allow ENGIE Resources LLC (ENGIE) to acquire and use 20,468 Class III renewable energy certificates (RECs) generated by its affiliate, Ryegate Associates, toward ENGIE's 2019 Renewable Portfolio Standard (RPS) Class III compliance obligation, even though those RECs will not be listed in its NEPOOL-GIS "My Settled Certificates Disposition" Report. The limited rule waiver was granted contingent upon the Commission's receipt of (1) written confirmation from the Connecticut Public Utilities Regulatory Authority (CT PURA) that the RECs will not be used toward that state's RPS compliance obligations, and (2) written certification and documentation from ENGIE at the time of filing its RPS compliance submission due by July 1, 2020 that those RECs have been retired and used to meet RPS obligations only in New Hampshire and have not been accounted for the RPS compliance obligations of any other jurisdiction.

On June 9, 2020, Staff received a copy of CT PURA's Motion No. 1 approval issued on June 9, 2020 in its Docket 20-06-01. A copy of that approval is attached to this memorandum. The CT PURA approval confirms that CT PURA will not use the RECs in question "towards any of Engie's Connecticut RPS 2019 obligations."

On June 11, 2020, Staff received a copy of a signed certification letter from ENGIE representative Stuart Eng stating that

ENGIE Resources hereby certifies that, when it submits its 2019 RPS compliance filing which is due by July 1, 2020, the 20,468 NH Class III RECs that are to be acquired from ENGIE Resources' affiliated NH Class III-registered generation facility, Ryegate Associates (NH-III-14-006),

will be retired and used to meet RPS obligations only in NH and will not be accounted for as RPS compliance obligations in any other jurisdiction.

The ENGIE letter further included supporting documentation referencing the relevant REC account information, CT PURA motion approval, and Commission rule waiver approval. A copy of the ENGIE letter without the supporting documentation is attached to this memorandum.

Staff believes that the submissions described above serve to satisfy the Commission's rule waiver approval conditions, and files them into the record with this memorandum.



June 10, 2020

NH Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429  
**Attn: Debra A. Howland, Executive Director**

**RE: ENGIE RESOURCES LLC & RYEGATE ASSOCIATES – REC20-079 REQUEST FOR WAIVER OF PUC 2503.03(d)**

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Dear Ms. Howland,

In response to New Hampshire Public Utilities Commission's ("NH PUC") letter dated May 28, 2020 with respect to the above-referenced matter, ***ENGIE Resources hereby certifies that, when it submits its 2019 RPS compliance filing which is due by July 1, 2020, the 20,468 NH Class III RECs that are to be acquired from ENGIE Resources' affiliated NH Class III-registered generation facility, Ryegate Associates (NH-III-14-006), will be retired and used to meet RPS obligations only in NH and will not be accounted for as RPS compliance obligations in any other jurisdiction.***

Supporting documentation re the above is attached hereto as follows:

- 1) ENGIE Resources' Approval Request to NH PUC dated 05/19/2020;
- 2) ENGIE Resources' Waiver Request to CT Public Utility Regulatory Authority ("CT PURA") dated 05/19/2020;
- 3) Ryegate GIS Q1 Report NEPOOL My\_Generation\_Certificate\_Dispostion;
- 4) NH PUC Approval dated 05/28/2020; and
- 5) CT PURA Approval dated 06/09/2020.

ENGIE Resources greatly appreciates the NH PUC granting this limited waiver under Puc 201.05.

Please let me know if you require anything further.

Regards,

*Stuart Eng*

Stuart Eng (Jun 10, 2020 16:51 CDT)

Stuart Eng  
Supply Manager  
ENGIE Resources LLC  
[stuart.eng@engie.com](mailto:stuart.eng@engie.com)






# NH PUC - 2019 RPS Ryegate REC Issue 06.10.20

Final Audit Report

2020-06-10

Created:	2020-06-10
By:	Marsha Griffin (Marsha.Griffin@engie.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAynukR4j0kEnUaDgVtJjVA2p1REN7UhKP

## "NH PUC - 2019 RPS Ryegate REC Issue 06.10.20" History

-  Document created by Marsha Griffin (Marsha.Griffin@engie.com)  
2020-06-10 - 9:49:06 PM GMT- IP address: 104.215.72.99
-  Document emailed to Stuart Eng (stuart.eng@engie.com) for signature  
2020-06-10 - 9:48:30 PM GMT
-  Email viewed by Stuart Eng (stuart.eng@engie.com)  
2020-06-10 - 9:50:46 PM GMT- IP address: 50.229.120.110
-  Document e-signed by Stuart Eng (stuart.eng@engie.com)  
Signature Date: 2020-06-10 - 9:51:11 PM GMT - Time Source: server- IP address: 50.229.120.110
-  Signed document emailed to Marsha Griffin (Marsha.Griffin@engie.com) and Stuart Eng (stuart.eng@engie.com)  
2020-06-10 - 9:51:11 PM GMT



May 19, 2020

**VIA EMAIL:** Debra A. Howland, [executivedirector@puc.nh.gov](mailto:executivedirector@puc.nh.gov)

Commission Executive Director  
NH Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429

**Attn: Debra A. Howland, Executive Director**

**RE: ENGIE RESOURCES LLC & RYEGATE ASSOCIATES - Q1 2019 RENEWABLE ENERGY CERTIFICATES ("RECs")**

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Good Morning,

Pursuant to correspondence with Deandra Perruccio instructions dated April 28, 2020 with respect to the above-referenced matter, ENGIE Resources, the Affiliated Supplier, and Ryegate Associates, the Generator, have agreed to an internal deal for ENGIE Resources to utilize the RECs that were inadvertently placed into a retirement subaccount and therefore could no longer be accessed by Ryegate Associates.

By allowing ENGIE Resources, a Load Serving Entity ("LSE") in NEPOOL, to utilize these RECs for their obligations for NH Class III RECs would resolve this issue for both parties. Ryegate Associates, as a Generator, has no obligation for load in NEPOOL.

As requested, pursuant to *Puc 2503.03(d)*, attached is a copy of the "My Settled Certificates Disposition". The RECs that ENGIE Resources wishes to **waive** 20,468 dually qualified as CT I as well as NH III to be utilized are as follows:

**2019/01 MSS2433 RYEGATE-1-NEW VT 3270540-1 to 13265 13, 265 Settled CT**

**2019/02 MSS2433 RYEGATE-1-NEW VT 3279549-1 to 7203 7,203 Settled CT**

Also attached hereto is ENGIE Resources' letter to CT PURA requesting their acknowledgement that Ryegate Associates has no obligation to retire RECs in CT as it is not an LSE.

Please let me know if you need any additional information. Thank you for your assistance with this matter – it is greatly appreciated.

Regards,

*Stuart Eng*

Stuart Eng (May 19, 2020 09:24 CDT)

Stuart Eng  
Supply Manager  
ENGIE Resources LLC  
[stuart.eng@engie.com](mailto:stuart.eng@engie.com)

cc: Deandra Perruccio






# NH PUC - Ryegate Class III REC Issue 05.19.20

Final Audit Report

2020-05-19

Created:	2020-05-19
By:	Marsha Griffin (Marsha.Griffin@engie.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAArv4dFkmSlas54gH0fuUujvMpRXAtgOUb

## "NH PUC - Ryegate Class III REC Issue 05.19.20" History

-  Document created by Marsha Griffin (Marsha.Griffin@engie.com)  
2020-05-19 - 1:58:06 PM GMT- IP address: 38.112.162.56
-  Document emailed to Stuart Eng (stuart.eng@engie.com) for signature  
2020-05-19 - 1:58:25 PM GMT
-  Email viewed by Stuart Eng (stuart.eng@engie.com)  
2020-05-19 - 2:24:31 PM GMT- IP address: 38.104.60.211
-  Document e-signed by Stuart Eng (stuart.eng@engie.com)  
Signature Date: 2020-05-19 - 2:24:47 PM GMT - Time Source: server- IP address: 38.104.60.211
-  Signed document emailed to Marsha Griffin (Marsha.Griffin@engie.com) and Stuart Eng (stuart.eng@engie.com)  
2020-05-19 - 2:24:47 PM GMT



May 19, 2020

**VIA EMAIL: [Jeff.Gaudiosi@ct.gov](mailto:Jeff.Gaudiosi@ct.gov)**

CT Public Utility Regulatory Authority  
Ten Franklin Square  
New Britain, CT 06051

**Attn: Jeff Gaudiosi, Executive Secretary**

**RE: ENGIE RESOURCES LLC & RYEGATE ASSOCIATES - Q1 2019 RENEWABLE ENERGY CERTIFICATES ("RECs")**

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Dear Sir,

ENGIE Resources and Ryegate Associates have been working with the New Hampshire Public Utility Commission with respect to the above-referenced matter. ENGIE Resources, the Affiliated Supplier, and Ryegate Associates, the Generator, have agreed to an internal deal for ENGIE Resources to utilize the Ryegate generated RECs, that are dual qualified for CT Class I and NH Class III, for their 2019 NH Class III compliance obligation (these RECs were inadvertently placed into a retirement subaccount which could no longer be accessed by Ryegate Associates).

By allowing ENGIE Resources, a Load Serving Entity ("LSE") in NEPOOL, to utilize these RECs for their obligations for NH Class III RECs would resolve this issue for both parties. Ryegate Associates, as a Generator, has no obligation for load in NEPOOL.

Attached is a copy of the "My Settled Certificates Disposition". The RECs that ENGIE Resources wishes to **waive** to be utilized are as follows:

**2019/01 MSS2433 RYEGATE-1-NEW VT 3270540-1 to 13265 13, 265 Settled CT**

**2019/02 MSS2433 RYEGATE-1-NEW VT 3279549-1 to 7203 7,203 Settled CT**

Please let me know if you need any additional information. ENGIE Resources and Ryegate Associates appreciate your assistance and would your concurrence with this matter.

Regards,

*Stuart Eng*

Stuart Eng (May 19, 2020 09:24 CDT)

Stuart Eng  
Supply Manager  
ENGIE Resources LLC  
[stuart.eng@engie.com](mailto:stuart.eng@engie.com)

cc: Donna Devino (via email: [donna.devino@ct.gov](mailto:donna.devino@ct.gov))  
Maureen Hoffman (via email: [Maureen.hoffman@ct.gov](mailto:Maureen.hoffman@ct.gov))






# CT PURA - Ryegate Class III REC Issue 05.19.20

Final Audit Report

2020-05-19

Created:	2020-05-19
By:	Marsha Griffin (Marsha.Griffin@engie.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAAn37fkz7cNAAfyogmW-_l_ugnyfL5dPqQp

## "CT PURA - Ryegate Class III REC Issue 05.19.20" History

-  Document created by Marsha Griffin (Marsha.Griffin@engie.com)  
2020-05-19 - 1:56:43 PM GMT- IP address: 38.112.162.56
-  Document emailed to Stuart Eng (stuart.eng@engie.com) for signature  
2020-05-19 - 1:57:14 PM GMT
-  Email viewed by Stuart Eng (stuart.eng@engie.com)  
2020-05-19 - 2:24:02 PM GMT- IP address: 38.104.60.211
-  Document e-signed by Stuart Eng (stuart.eng@engie.com)  
Signature Date: 2020-05-19 - 2:24:21 PM GMT - Time Source: server- IP address: 38.104.60.211
-  Signed document emailed to Stuart Eng (stuart.eng@engie.com) and Marsha Griffin (Marsha.Griffin@engie.com)  
2020-05-19 - 2:24:21 PM GMT



My Generator Certificate Disposition Report; Account Holder ID: 14302; From '2019-Q1' to '2019-Q1'. Print date: 04/28/2020 02:37:27 PM (GMT+00:00)

Month of Generation	Unit ID	Plant Unit	State	Certificate Serial Numbers	Quantity	Status	Sub Account Type
2019/01	MSS2433	RYEGATE 1-NEW	VT	3270540 - 1 to 13265	13,265	Settled	CT
2019/01	MSS2433	RYEGATE 1-NEW	VT	3270549 - 1 to 21	21	Banked	
2019/02	MSS2433	RYEGATE 1-NEW	VT	3279549 - 1 to 7203	7,203	Settled	CT
2019/02	MSS2433	RYEGATE 1-NEW	VT	3279549 - 7204 to 12707	5,504	Banked	
2019/02	MSS2433	RYEGATE 1-NEW	VT	3279554 - 1 to 11	11	Banked	
2019/03	MSS2433	RYEGATE 1-NEW	VT	3301903 - 1 to 11192	11,192	Banked	
2019/03	MSS2433	RYEGATE 1-NEW	VT	3301903 - 11193 to 11499	307	Banked	
2019/03	MSS2433	RYEGATE 1-NEW	VT	3301903 - 11500 to 11545	46	Banked	
2019/03	MSS2433	RYEGATE 1-NEW	VT	3301903 - 11546 to 13333	1,788	Banked	
2019/03	MSS2433	RYEGATE 1-NEW	VT	3301903 - 13334 to 13610	277	Banked	
2019/03	MSS2433	RYEGATE 1-NEW	VT	3301903 - 13611 to 14964	1,354	Banked	

CHAIRWOMAN  
Dianne Martin

STATE OF NEW HAMPSHIRE

TDD Access: Relay NH  
1-800-735-2964

COMMISSIONERS  
Kathryn M. Bailey  
Michael S. Giaimo



Tel. (603) 271-2431

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EXECUTIVE  
DIRECTOR  
Debra A. Howland

Website:  
[www.puc.nh.gov](http://www.puc.nh.gov)

**PUBLIC UTILITIES COMMISSION**

21 S. Fruit St., Suite 10  
Concord, N.H. 03301-2429

May 28, 2020

Stuart Eng  
Supply Manager  
ENGIE Resources LLC  
[stuart.eng@engie.com](mailto:stuart.eng@engie.com)

Re: REC 20-079, Ryegate Associates and ENGIE Resources LLC  
Request for Waiver of Puc 2503.03(d)

Dear Mr. Eng:

On May 19, 2020, you filed on behalf of ENGIE Resources LLC (ENGIE), a request that the Commission waive N.H. Admin. R., Puc 2503.03(d), in order to permit 20,468 Class III renewable energy certificates (RECs) to be used to meet ENGIE's 2019 Renewable Portfolio Standard (RPS) Class III compliance obligation even though those RECs will not be listed on its "My Settled Certificates Disposition" Report issued by NEPOOL-GIS (New England Power Pool Generator Information System).

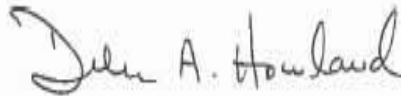
On May 26, 2020, Commission Staff (Staff) filed a memorandum summarizing its review and analysis of ENGIE's rule waiver request, and recommending that the Commission grant a waiver of Puc 2503.03(d) to allow ENGIE to use for 2019 RPS compliance 20,468 New Hampshire Class III RECs to be acquired from its affiliated New Hampshire Class III-registered generation facility, Ryegate Associates (Ryegate) (NH-III-14-006), which RECs were inadvertently retired into Ryegate's NEPOOL-GIS subaccount.

Staff further recommended that the waiver and subsequent acceptance of those RECs be made contingent upon confirmation from the Connecticut Public Utilities Regulatory Authority (CT PURA) that the RECs will not be used toward that state's compliance obligations and inclusion with ENGIE's 2019 RPS compliance filing of both certification and documentation that the referenced RECs have not been accounted in the RPS compliance obligations of any other jurisdiction.

The Commission has reviewed ENGIE's rule waiver request and Staff's recommendation, and has determined that a rule waiver may be granted in this instance under Puc 201.05, because the limited waiver requested would not disrupt the orderly and efficient resolution of matters before the Commission and would serve the public interest, inasmuch as the purpose of the rules would be satisfied by the alternative method proposed.

Accordingly, the Commission has granted a limited waiver of the otherwise applicable RPS compliance documentation requirement set forth in Puc 2503.03(d) to allow ENGIE to acquire and use 20,468 Class III RECs generated by Ryegate toward ENGIE's 2019 RPS Class III compliance obligation, even though those RECs will not be listed in its NEPOOL-GIS "My Settled Certificates Disposition" Report. The limited rule waiver is granted contingent upon the Commission's receipt of (1) written confirmation from CT PURA that the RECs will not be used toward that state's RPS compliance obligations, and (2) written certification and documentation from ENGIE at the time of filing its RPS compliance submission due by July 1, 2020 that those RECs have been retired and used to meet RPS obligations only in New Hampshire and have not been accounted for the RPS compliance obligations of any other jurisdiction.

Sincerely,

A handwritten signature in black ink that reads "Debra A. Howland". The signature is written in a cursive style with a large initial "D".

Debra A. Howland  
Executive Director

cc: Service List  
Docket File

# Service List - Docket Related

Docket# : 20-079

Printed: 5/28/2020

Email Addresses

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# STATE OF CONNECTICUT

## PUBLIC UTILITIES REGULATORY AUTHORITY

June 9, 2020

In reply, please refer to:

Docket No. 20-06-01

Motion No. 1

Scott E. Dibbs  
Engie North America  
1360 Post Oak Blvd., Suite 400  
Houston, TX 77056

Re: Docket No. 20-06-01 – Annual Review of Connecticut Electric Suppliers’ and Electric Distribution Companies’ Compliance with Connecticut’s Renewable Energy Portfolio Standards in the Year 2019

Dear Mr. Dibbs:

The Public Utilities Regulatory Authority (Authority or PURA) received on June 5, 2020, Engie North America’s (Engie or Company) motion (Motion) requesting that the Authority allow certain inadvertently-retired renewable energy certificates (RECs) to be counted towards the Company’s compliance with New Hampshire’s 2019 renewable portfolio standards (RPS). Specifically, according to the Company, Engie incorrectly retired Connecticut Class I or New Hampshire Class III RECs account number 3621467 serial number 1-5635 and account number 3633287 serial number 1-14139<sup>1</sup> (together Misplaced RECs) into a Connecticut “Settled” account, when said Misplaced RECs need to be used towards Engie’s 2019 New Hampshire RPS compliance.

Engie stated that because of an unknown programming change made by APEX to the NEPOOL GIS system, “which allowed the user to accept RECs directly into a sub account, without any further action”<sup>2</sup> led to only two choices for the RECs to be placed into a Ryegate (Engie’s Generator), NULL or a subaccount. The “retirement subaccount was created by another user, however as Ryegate is not a load serving entity and has no RPS standards the account was never used. As the only selection other than NULL was the subaccount, the RECs were placed there.”<sup>3</sup>

According to the NEPOOL-GIS Operating Rules, certificates retired/settled in a compliance subaccount are taken out of circulation and cannot be resettled or moved, nor can the label be changed, for any reason, once a trading period is closed. The “My Unassigned Obligation” subaccount is mainly used for load obligation management and is treated as a compliance subaccount in NEPOOL GIS. As a result, RECs placed in this subaccount are retired and taken out of circulation.

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<sup>1</sup> Engie Affidavit, p. 2

<sup>2</sup> Id.

<sup>3</sup> Id.

Upon learning that these RECs were inadvertently retired, Engie submitted its Motion to request that the Authority grant recognition of these RECs for the purposes of its 2019 RPS obligations and guarantee the RECs will not be used for any Connecticut obligations so that they may instead be used to satisfy Engie's 2019 New Hampshire obligations.

The Authority has repeatedly held that it will not review or rectify any administrative or clerical errors of any person and/or entities who fail to comply with NEPOOL GIS rules or overlook the results of the GIS based upon clerical or managerial error. The Authority determined the requirement of strict adherence to NEPOOL GIS rules must be applied equally to all load-serving entities. Further, as articulated in the Authority's Notice of Proceeding:

Any motions regarding misplaced or inadvertently transferred RECs in the NEPOOL-GIS system must be filed with the Authority no later than **12:00 P.M., July 31, 2020**. After July 31, 2020, the Authority will no longer entertain any requests for Authority approval to reallocate and use misplaced or inadvertently transferred RECs for the 2019 RPS compliance year, and any subsequent compliance years thereafter. After July 31, 2020, load serving entities will be solely responsible for properly managing, transferring and settling their RECs in the NEPOOL GIS system.

Therefore, the Authority grants Engie's Motion and confirms that it will not use the above-mentioned Misplaced RECs towards any of Engie's Connecticut RPS 2019 obligations; however, the Authority reiterates its directive as stated in the NOP that similar motions will not be entertained if received after July 31, 2020 or in future compliance years.

Sincerely,

PUBLIC UTILITIES REGULATORY AUTHORITY

A handwritten signature in black ink, appearing to read 'Jeffrey R. Gaudiosi', written over a horizontal line.

Jeffrey R. Gaudiosi  
Executive Secretary

cc: Service List



# STATE OF CONNECTICUT

## PUBLIC UTILITIES REGULATORY AUTHORITY

June 9, 2020  
In reply, please refer to:  
Docket No. 20-06-01  
Motion No. 1

Scott E. Dibbs  
Engie North America  
1360 Post Oak Blvd., Suite 400  
Houston, TX 77056

Re: Docket No. 20-06-01 – Annual Review of Connecticut Electric Suppliers’ and Electric Distribution Companies’ Compliance with Connecticut’s Renewable Energy Portfolio Standards in the Year 2019

Dear Mr. Dibbs:

The Public Utilities Regulatory Authority (Authority or PURA) received on June 5, 2020, Engie North America’s (Engie or Company) motion (Motion) requesting that the Authority allow certain inadvertently-retired renewable energy certificates (RECs) to be counted towards the Company’s compliance with New Hampshire’s 2019 renewable portfolio standards (RPS). Specifically, according to the Company, Engie incorrectly retired Connecticut Class I or New Hampshire Class III RECs account number 3621467 serial number 1-5635 and account number 3633287 serial number 1-14139<sup>1</sup> (together Misplaced RECs) into a Connecticut “Settled” account, when said Misplaced RECs need to be used towards Engie’s 2019 New Hampshire RPS compliance.

Engie stated that because of an unknown programming change made by APEX to the NEPOOL GIS system, “which allowed the user to accept RECs directly into a sub account, without any further action”<sup>2</sup> led to only two choices for the RECs to be placed into a Ryegate (Engie’s Generator), NULL or a subaccount. The “retirement subaccount was created by another user, however as Ryegate is not a load serving entity and has no RPS standards the account was never used. As the only selection other than NULL was the subaccount, the RECs were placed there.”<sup>3</sup>

According to the NEPOOL-GIS Operating Rules, certificates retired/settled in a compliance subaccount are taken out of circulation and cannot be resettled or moved, nor can the label be changed, for any reason, once a trading period is closed. The “My Unassigned Obligation” subaccount is mainly used for load obligation management and is treated as a compliance subaccount in NEPOOL GIS. As a result, RECs placed in this subaccount are retired and taken out of circulation.

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<sup>1</sup> Engie Affidavit, p. 2

<sup>2</sup> Id.

<sup>3</sup> Id.

Upon learning that these RECs were inadvertently retired, Engie submitted its Motion to request that the Authority grant recognition of these RECs for the purposes of its 2019 RPS obligations and guarantee the RECs will not be used for any Connecticut obligations so that they may instead be used to satisfy Engie's 2019 New Hampshire obligations.

The Authority has repeatedly held that it will not review or rectify any administrative or clerical errors of any person and/or entities who fail to comply with NEPOOL GIS rules or overlook the results of the GIS based upon clerical or managerial error. The Authority determined the requirement of strict adherence to NEPOOL GIS rules must be applied equally to all load-serving entities. Further, as articulated in the Authority's Notice of Proceeding:

Any motions regarding misplaced or inadvertently transferred RECs in the NEPOOL-GIS system must be filed with the Authority no later than **12:00 P.M., July 31, 2020**. After July 31, 2020, the Authority will no longer entertain any requests for Authority approval to reallocate and use misplaced or inadvertently transferred RECs for the 2019 RPS compliance year, and any subsequent compliance years thereafter. After July 31, 2020, load serving entities will be solely responsible for properly managing, transferring and settling their RECs in the NEPOOL GIS system.

Therefore, the Authority grants Engie's Motion and confirms that it will not use the above-mentioned Misplaced RECs towards any of Engie's Connecticut RPS 2019 obligations; however, the Authority reiterates its directive as stated in the NOP that similar motions will not be entertained if received after July 31, 2020 or in future compliance years.

Sincerely,

PUBLIC UTILITIES REGULATORY AUTHORITY

A handwritten signature in black ink, appearing to read 'Jeffrey R. Gaudiosi', is written over a faint, illegible background.

Jeffrey R. Gaudiosi  
Executive Secretary

cc: Service List



Executive.Director@puc.nh.gov

amanda.noonan@puc.nh.gov

david.wiesner@puc.nh.gov

deandra.perruccio@puc.nh.gov

karen.cramton@puc.nh.gov

ocalitigation@oca.nh.gov

Scott.Dibbs@engie.com