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Climate Office
Utilities Commission

September 19, 2008

North Carolina Renewable Energy and Energy Efficiency Portfolio Standard

Re: APX Comments to the North Carolina Utilities Commission on Docket No. E100, SUB 121

APX Inc. appreciates the opportunity to submit comments on the North Carolina Utilities Commission's September 4, 2008 Order establishing the process for defining the REC tracking system requirements and selecting a provider. We commend Governor Easley, the North Carolina General Assembly and, the Commission for their leadership in this important area, as well as the North Carolina utilities and many other committed stakeholders for their efforts and support in pursuing a comprehensive policy for advancing renewable energy in the State of North Carolina.

APX is the leading infrastructure provider for environmental and energy markets in renewable energy and greenhouse gases including carbon commodities. The APX Environmental Market Depository™ is trusted to create, track, manage, and retire renewable energy certificates (RECs), energy efficiency and conservation certificates, carbon offset credits such as verified emissions reductions (VERs), and greenhouse gas emission allowances.

The company is the system provider of choice for every major US renewable energy market:

- ERCOT Renewable Energy Credit Trading System
- NEPOOL Generation Information System (GIS)
- PJM-Generation Attributes Tracking System (GATS)
- Western Renewable Energy Generation Information System (WREGIS)
- Midwest Renewable Energy Tracking System (M-RETS)

APX also provides the highest quality transaction and data infrastructure and services for the tracking of GHG offsets and allowances, including such international entities as the Voluntary Carbon Standard and The Gold Standard.

North Carolina Renewable Energy Certificate Tracking System: APX has reviewed the system outline and criteria contained in the Commission's order. We find the outline comprehensive and thoughtful. Given our experience in other state RPS markets, we strongly believe that system infrastructure is one of the key considerations to effectively operate such a market; while insuring market efficiency, market integrity, public transparency and market oversight. We commend the Commission for its forward thinking on these matters, including the necessary underlying accounting, auditing and

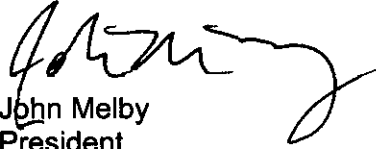
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serialized tracking system that will be essential to support this market. We also note that such a system will provide for ease of reporting by the utilities and ease of audit and oversight by the Commission. This model has been proven successful in other state RPS markets, such as in the Midwest states with the MRETS and in New England with the NEPOOL GIS. Our review of the North Carolina requirements indicates that currently available technology and infrastructure services exist to fully meet North Carolina's needs regarding a Renewable Energy Certificate Tracking System.


APX is pleased to offer its insights from its broad experience in developing transactional-based certificate tracking and reporting systems, and looks forward to further participation in the North Carolina Renewable Energy and Energy Efficiency Portfolio Standard stakeholder processes.

Please feel free to email with any questions: jmelby@apx.com or gguzy@apx.com.
Thank you.

Sincerely,



John Melby
President
APX, Inc.



Gary S. Guzy
General Counsel
APX, Inc.