



Clean Power Markets, Inc.

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September 19, 2008

Ms. Renne Vance
Chief Clerk
North Carolina Public Utilities
Commission
430 North Salisbury St.
Dobbs Building
Raleigh NC 27603-5918

FILED

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Clerk's Office
N.C. Utilities Commission

Dear Ms. Vance:

Please find enclosed comments on behalf of Clean Power Markets Inc. relevant to Docket No. E-100, Sub 121, the Renewable Energy Credit Tracking System.

We appreciate the opportunity to present our views on this important issue.

Please do not hesitate to contact me if you need further information.

Sincerely,

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Comments of Clean Power Markets Inc
to the North Carolina Utilities Commission
Docket No. E-100, Sub 121
Renewable Energy Credit Tracking System

Clean Power Markets Inc. (CPM), a wholly owned subsidiary of Enerwise Global Technologies, appreciates the opportunity to provide comments with respect to the NCUC order relevant to the North Carolina Renewable Energy Credit Tracking System (NC-RETS).

CPM commends the Commission for its commitment to secure a third party entity to administer a Renewable Energy Credit (REC) tracking and management system. Our experience in providing this service to the states of New Jersey and Pennsylvania confirms that these systems are vital to the success of renewable energy portfolio programs. In fact, we have been endorsed by the Mid-Atlantic Solar Industries Association (MSFIA).

CPM's comprehensive menu of capabilities is well suited to the needs of North Carolina's Renewable Energy and Energy Efficiency Portfolio Standard (REPS). Our priority is to provide a user-friendly, reliable and transparent system to accommodate all stakeholders: small and large generators, electric suppliers (and their compliance responsibilities), brokers, aggregators, Utilities Commission members and staff, and other interested parties.

In order to maximize the value of the North Carolina REPS, we suggest that these functions be included as part of the NC-RETS system:

- The calculation and recordation of RECs, prior to their issuance, based on reported generation data and generation facility information for each type of renewable energy application.
- The calculation and recordation of RECs, prior to their issuance, for energy efficiency/demand side management data.
- For the purposes of educating the public with respect to REC tracking, trading, audits, system transparency and other relevant information, regularly scheduled (eg monthly) teleconference training sessions for new and existing generators.
- For the purposes of trading RECs and to maximize their value to the North Carolina REC owner, the creation of a "regional bulletin board" (to include other states) if appropriate and beneficial to the North Carolina REPS.

- For the purposes of maximizing REC value to the North Carolina REC owner, the creation of a price reporting system to track the price of every REC transfer; and the posting of this information on the administrator's website for public view.
- Provide annual reporting services to North Carolina electricity suppliers and Utilities Commission staff with respect to their compliance with the requirements of the REPS.
- Confirmation of individual REC transactions.
- Assurance against "double counting" of RECs.
- An "escrow" account for assurance of payments to seller that includes a 30-day "hold" feature.
- Audits to certify renewable energy generation validity.
- Operation of a customer service telephone "hotline" during normal business hours, to respond to REC-related inquiries from REPS stakeholders.

Clean Power Markets Inc. stands ready to assist North Carolina as it moves forward with its Renewable Energy and Energy Efficiency Portfolio Standard.

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