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NCSEA

North Carolina Sustainable Energy Association
Education - Public Policy - Economic Development

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FILED

SEP 22 2008

Chief Clerk
N.C. Utilities Commission

September 22, 2008

Ms. Renee Vance
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699

RE: Docket No. E-100, Sub 121

Enclosed are the original and thirty (30) copies of the North Carolina Sustainable Energy Association's Initial Comments in response to the Commission's September 4, 2008 Order in the above captioned docket. All parties of record have been served.

Thank you for your attention to this matter.

Very truly yours,

Kurt J. Olson

Kurt J. Olson
Staff Counsel

Signed with
permission by
Elizabeth Brown
EJB
9/22/2008

Attachment

cc: Service List

cc: AS
7 Comm
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By Exec Dir.
Legal 3
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BEFORE THE STATE OF NORTH CAROLINA UTILITIES COMMISSION
RALEIGH, NC

Docket No. E-100, SUB 121

FILED
SEP 22 2008
Clerk's Office
N.C. Utilities Commission

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|---|---|------------------------------|
| In the Matter of |) | |
| Implementing a Tracking System for |) | COMMENTS BY THE NORTH |
| Renewable Energy Certificates |) | CAROLINA SUSTAINABLE |
| Pursuant to Session Law 2007-397 |) | ENERGY ASSOCIATION |

In accordance with the North Carolina Utility Commission's ("the Commission") September 4, 2008 Order in the Docket E-100, Sub 121, the North Carolina Sustainable Energy Association ("NCSEA") hereby respectfully submits the following comments on establishing a process for defining renewable energy certificate ("REC") tracking system requirements. NCSEA is a Section 501(c)(3) non-profit association that provides public education, collaborative leadership, and policy and technical analyses to ensure a sustainable future by promoting renewable energy and energy efficiency. NCSEA supports policies that advance a viable market and regulatory environment which enables citizens, businesses and government to use and benefit from economically and environmentally sustainable energy solutions. Its address is North Carolina Sustainable Energy Association, Post Office Box 6465, Raleigh, North Carolina 27628.

The attorney for NCSEA to whom all correspondence should be addressed is Kurt J. Olson, P.O. Box 6465, Raleigh, NC 27628. In addition, all email correspondence should be sent to kurt@energync.org with copies to Rosalie Day, Policy Director, rosalie@energync.org.

BACKGROUND

In a prior filing, NCSEA proffered the elements and criteria necessary to provide a functional and cost-effective tracking system to assure compliance with North Carolina's Renewable Energy Portfolio Standard ("REPS"). The adoption of these criteria and elements is necessary to evaluate qualified tracking systems, consistent with national trends, and assure that North Carolina's REPS is in line with recognized best practices to meet the goals and the objectives envisioned by the General Assembly when the standard was adopted as law and implemented by the Commission's rules.

NCSEA thanks the Commission for opening a docket and convening stakeholder groups to evaluate and identify the requisite elements and criteria for appropriate REC Tracking System requirements.

COMMENTS

NCSEA has a broad range of substantive knowledge on REC tracking system functionality and requirements for administratively simplifying REPS compliance. However, estimating numbers of users the system needs to accommodate is best answered in the work group process. As with many issues that are unique to North Carolina rules, such as combining REC tracking for renewable energy and verified energy efficiency savings, and including British Thermal Unit ("Btu") equivalents, the stakeholder process should be allowed to detail the specific functionalities.

Thus, we propose dual working groups, one of which is to specify interfaces to upload data from the varieties of renewable energy and energy efficiency resources set

forth by the rules and one for functionalities associated with transferring RECs between accounts, retiring RECs for compliance, and producing reports.

CERTIFICATE OF SERVICE

I hereby certify that the following persons on the docket mailing list have been served a copy of the North Carolina Sustainable Energy Association's Initial Comments in NCUC Docket No. E-100, Sub 121 by deposit in the U.S. Mail, postage prepaid, or by email transmission (as consented to):

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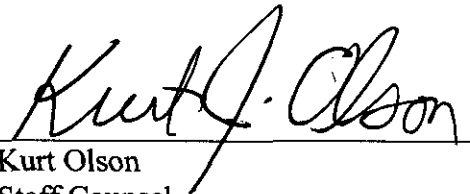
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This is the 22nd day of September, 2008.

A handwritten signature in black ink, reading "Kurt J. Olson", written over a horizontal line.

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