



NCSEA

North Carolina Sustainable Energy Association

P.O. Box 6465
Raleigh, NC 27628
(919) 832-7601

www.energync.org

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FILED
DEC 02 2008
Clerk's Office
N.C. Utilities Commission

VIA HAND DELIVERY

December 2, 2008

Ms. Renne C. Vance
Chief Clerk
The NC Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Docket No. E-100, Sub 121

Enclosed please find the original and thirty (30) copies of the North Carolina Sustainable Energy Association's Comments in the above captioned docket. All parties of record have been served.

MM
Full Dist.

Thank you for your attention to this matter.

Very truly yours,

Kurt Olson
Kurt Olson

Attachment

cc: Service List

**BEFORE THE STATE OF NORTH CAROLINA UTILITIES COMMISSION
RALEIGH, NC**

DOCKET E-100, SUB 121

FILED
DEC 02 2008
Clerk's Office
N.C. Utilities Commission

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

In accordance with the North Carolina Utility Commission's ("Commission's") September 4, 2008 Order in NCUC Docket No. E-100, Sub 121 and November 10, 2008 Order granting an extended time to file, the North Carolina Sustainable Energy Association ("NCSEA") hereby submits the following comments regarding the process and criteria that should be used by the Commission in evaluating applications submitted by renewable energy certificate ("REC") tracking system providers.

BACKGROUND

Pursuant to N.C. Gen. Stat. §§ 62-30 and 62-31 and NCUC Rules 1-4(2) and 1-5, NCSEA petitioned the Commission on July 17, 2008 to open a docket and commence all necessary formal proceedings to investigate, evaluate and identify the requisite elements and criteria of an appropriate Renewable Energy Certificates Tracking System ("REC Tracking System"). Attached to that petition, NCSEA submitted the conceptual elements and baseline criteria necessary for a functional tracking system to facilitate compliance with North Carolina's Renewable Energy Portfolio Standard ("REPS"). The Commission opened a docket on September 4,

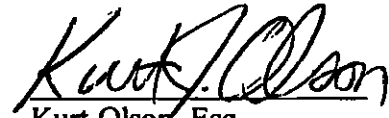
2008, established a schedule and now conducts stakeholder meetings to gather input for implementing a REC Tracking System pursuant to Session Law 2007-397.

RECOMMENDATION

NCSEA urges the Commission to find that any tracking system must, at a minimum, incorporate the functionalities set forth in NCSEA's Petition filed on July 17, 2008 and further detailed in the stakeholder process. In addition, essential design and operating criteria should include: scalability; accommodation for energy efficiency REC-equivalents capturing minimal program information and vintage; and a flexible, reliable approach to REC tracking system seams issues. The latter two criteria support the ease of auditing and transparency for determining REPS compliance.

NCSEA recommends that the Commission employ a stakeholder evaluation process through which stakeholders analyze system proposals and make a vendor selection recommendation to the Commission. We propose a 5-member stakeholder evaluation group representing the interests of (1) consumers (Public Staff), (2) electric cooperatives, (3) investor owned utilities, (4) municipal electric providers, and (5) renewable energy generators, respectively. Each stakeholder class would designate a single member to participate in the evaluation group. The Commission Staff would then schedule meetings and facilitate the evaluation process for the initial vendor selection recommendation. This group will remain established for input as needed through the roll-out of the RECs tracking system.

Respectfully submitted, the 2nd day of December, 2008.

A handwritten signature in black ink, appearing to read "Kurt Olson", written over a horizontal line.

Kurt Olson, Esq.
Staff Counsel for NCSEA
Bar # 22657
P.O. Box 6465
Raleigh, NC 27628

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 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):

Safiya Joseph
Sunedison, LLC
12500 Baltimore Avenue
Beltsville, MD 20705

Sharon Miller
Carolina Utility Customer Association Inc.
Trawick Professional Center
1708 Trawick Road, Suite 210
Raleigh, NC 27604

Michael Lavanga & Damon Xenopoulos
Brickfield, Burchette, Ritts, & Stone, P.C.
1025 Thomas Jefferson Street, NW
8th Floor
Washington, DC 20007

Daniel Higgins
Burns Day and Presnell, P.A.
P.O. Box 10867
Raleigh, NC 27605

Fred Tarver
NC Department of Environmental and
Natural Sciences
Division of Water Resources
1116 Mail Service Center
Raleigh, NC 27699-1611

M. Gray Styers
Blanchard, Jenkins, Miller, Lewis & Styers
1117 Hillsborough Street
Raleigh, NC 27603

Henry C. Campen, Jr.
Parker, Poe, Adams & Bernstein, LLP
First Union Capitol Center Ste 1400
150 Fayetteville Street Mall
Raleigh, NC 27602

James M. O'Connell
Southern Energy Management
410 North Boylan Avenue
Raleigh, NC 27603

Jennifer L. Collins
Womble Carlyle Sandridge & Rice, PLL
150 Fayetteville Street, Suite 2100
Raleigh, NC 27601-2959

Joshua Warmack
Enervision, Inc.
P.O. Box 450789
Atlanta, GA 31145

John Runkle
NC WARN
P.O. Box 3793
Chapel Hill, NC 27515

John Taylor
General Counsel
Acciona Energy North America Corporation
333 W Wacker Drive, Suite 1500
Chicago, IL 60606

Marilyn Nixon
Gudrun Thompson
Southern Environmental Law Center
Suite 330
200 West Franklin Street
Chapel Hill, NC 27516-2520

Richard Kucharski
General Counsel
Western Carolina University
H.F. Robinson Admin. Bldg., Room 530
Cullowhee, NC 28723

Len S. Anthony
Deputy General Counsel
Progress Energy Carolinas, Inc.
P.O. Box 1551
PEB 17A4
Raleigh, NC 27602-1551

Leonard G. Green
Assistant Attorney General
Attorney General's Office
Utilities Section
P.O. Box 629
Raleigh, NC 27602-0629

Lara S. Nichols
Brian L. Franklin
Counsel
Duke Power
422 S. Church Street, PB05E
Charlotte, NC 28202

Mary Lynne Grigg
Womble Carlyle Sandridge & Rice, PLL
P.O. Box 831
Raleigh, NC 27602

Michael A. Thompson
Manager, State Affairs-NC Dominion
Dominion
P.O. Box 26666
OJRP-20
Richmond, VA 23261

Michael S. Colo
Poyner & Spruill
P.O. Box 353
Rocky Mount, NC 27802-0353

Michael W. Washburn
Attorney at Law
Brown, Crump, Vanore & Tierney
421 Fayetteville Street Mall, Suite 1601
Raleigh, NC 27601

Horace Payne
Karen Bell
Pamela Walker
Counsel
Dominion NC Power
P.O. Box 26532
Richmond, VA 23261

Paul F. Wendelglass
Competitive Power Ventures
35 Braintree Hill Office Park
Suite 400
Braintree, MA 2184

Rick D. Chamberlain
Attorney at Law
Behrens, Taylor, Wheeler & Chamberlain
6 N.E. 63RD Street, Suite 400
Oklahoma City, OK 73102

Richard Tucker
Bio-Energy Conversion LLC
P.O. Box 326
Locust, NC 28097

Thomas K. Austin
Associate General Counsel
NC EMC
P.O. Box 27306
Raleigh, NC 27611-7306

Ralph McDonald
Bailey and Dixon, L.L.P.
P.O. Box 1351
Raleigh, NC 27602

Robert Page
Crisp, Page & Currin, L.L.P.
4010 Barrett Drive, Suite 205
Raleigh, NC 27609-6622

Michael J. Rustum
Dickstein, Shapiro Morin & Oshinsky LLP
1825 Eye Street NW
Washington, DC 20006-5403

Robert W. Kaylor
Law Office of Robert W. Kaylor
225 Hillsborough Street, Suite 160
Raleigh, NC 27603

Stephon J. Bowens
Blanchard, Jenkins, Miller, Lewis & Styers,
P.A.
1117 Hillsborough Street
Raleigh, NC 27603

Scott H. Debroff, Esquire
Smigel, Anderson & Sacks, LLP
River Chase Office Center
4431 North Front Street
Harrisburg, PA 17110

Timothy Q. Conboy
Acciona Wind Energy
Rensselaer Rechnology Park
165 Jordan Road
Troy, NY 12180

Wayne Wilkins
EnergyUnited EMC
P.O. Box 1831
Statesville, NC 28687

C Norman Young, Jr.
Assitant Attorney General
NC Department of Justice
9001 Mail Service Center
Raleigh, NC 27699-9001

Marc Bernstein
North Department of Justice
Environmental Division
P.O. Box 629
Raleigh, NC 27602-0629

Phillip J. Hicks
President
Ecoplus, Inc.
9300 Harris Corners Parkway, Suite 170
Charlotte, NC 28269

Janice Carney
Electricities of North Carolina, Inc.
1427 Meadow Wood Blvd.
Raleigh, NC 27604

Edward Niblock
Fibrowatt, LLC
1717 Langhorne-Newton Road
One Summit Square, Suite 200
Langhorne, PA 19047

William H. Lee
P.O. Box 1459
Asheboro, NC 27204

Jeffrey J. Owen
McGuire Wood & Bissette, P.A.
P.O. Box 3180
Asheville, NC 28802

Christopher J. Blake
Joseph Eason
Nelson, Mullins, Riley & Scarborough, LLP
4140 Parklane Avenue, Suite 200
Raleigh, NC 27622-0519

H. Julian Philpott, Jr.
Secretary and General Counsel
North Carolina Farm Bureau Federation,
Inc.
P.O. Box 27766
Raleigh, NC 27611

Robert W. Odom
P.O. Box 159
125 North Fourth Street
Albemarle, NC 28002

Jane Lewis-Raymond
Vice President & General Counsel
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, NC 28233

This is the 2nd day of December, 2008.

A handwritten signature in black ink, reading "Kurt J. Olson". The signature is written in a cursive style with a horizontal line underneath it.

Kurt Olson
Staff Counsel
P.O. Box 6465
Raleigh, NC 27628
Bar # 22657