RENEWABLE ENERGY RESOURCES ELIGIBILITY
INCLIME, INC. TEAM RECOMMENDATION
For Consideration By The
STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
(Version 10 – November 9th, 2016)

Date: 12/17/2023 **Docket #:** RES-23-01

Application Received: 01/23/2023

Generation Unit Information:
Unit Name: Sunnova - Rhode Island Aggregation
Unit Owner: Sunnova Energy International Inc
Unit Size (nameplate MW): 2.384 AC/2.762 DC
Unit Size (max. demonstrated MW): 2.384 AC/2.762 DC
Location (city, state): Various in Rhode Island

Commercial Operation Date: 08/27/2020

Type of Certification Requested:
☒ Standard Certification
☐ Prospective Certification (Declaratory Judgment)

Generation Type and Technology Information: *(check all that apply)*
☐ Repowered Project ☐ Incremental Generation ☐Incremental Intermittent
☒ Customer-Sited or Off-Grid System (or associated aggregations)
☐ Generation Unit Located in Control Area Adjacent to NEPOOL: XXXX
☒ Solar ☐ Wind ☐ Ocean Thermal ☐ Geothermal ☐ Small Hydro
☐ Eligible Biomass ☐ Unlisted Biomass ☐ Biomass (fossil co-fired/multi-fuel) ☐ Fuel Cell (using an eligible renewable resource)

Recommendation:
☒ Approve (GIS Certification #: Various) ☐ Reject ☐ Public Hearing Needed
☐ Existing Renewable Energy Resource ☒ New Renewable Energy Resource
☐ Capable of Producing as Both Existing & New Renewable Energy Resource

Comments: ***RECOMMENDATIONS AND APPROVALS; REQUIRED DOCUMENTATION***
Sunnova is applying for a solar aggregation for their PPA/Lease Systems. Sunnova owns both the solar arrays and the credits for their initial submission. Their initial application consists of 420 generators that are all net-metered and located in Rhode Island. They are requesting to use Solar Edge as their independent verifier. Solar Edge is requesting verification as an independent verifier in Rhode Island. Solar Edge is currently registered as an independent verifier in NEPOOL GIS and has provided a detailed process document. Solar Edge does not receive compensation based on the number of registered systems or RECs generated. Each generation unit will have its own NEPOOL GIS ID to make reporting easier and to reduce the chance of double counting generation. Additionally, there will be one certification number applied to the aggregate and a separate certification number issued to each generation unit that associates to the aggregate application. These systems were all reviewed by Rhode Island Energy and were confirmed to have the correct capacity and had achieved ATI. InClime reviewed each NEPOOL GIS ID to confirm that they were associated with the correct facility.

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Backup Contact Name, Numbers and Address:
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Email: renewables@sunnova.com

Authorized Representative Name, Numbers and Address:
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Company: Sunnova Energy International Inc
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Phone: 281-832-0504
Email: renewables@sunnova.com

Owner Name, Numbers and Address:
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Address: 20 Greenway Plaza Suite 475 Houston, TX 77046
Phone: 2818320504
Email: renewables@sunnova.com

Operator Name, Numbers and Address:
Name and title: Sunnova Energy Corporation, Corporation
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RENEWABLE ENERGY RESOURCES ELIGIBILITY DETAILED INCLIME, INC TEAM APPLICATION REVIEW RESULTS

(Template V10 – November 9th, 2016)

Date of Final Review: 12/17/2023

Note: Depending on the type of application (project vintage, type, location, fuel source, etc.) not all of these data items will be applicable.

A. Renewable Energy Resource – Vintage (*see appropriate Sections of RES Regulations, Application Sections 3.1-3.9 and Appendix C*):

A . 1 Generation Unit meets the definition of an Existing Renewable Energy Resource noted in RES Regulations Section 3.10 (first entering commercial operation before 12/31/1997).

☐ Yes ☒ No ☐ N/A

Comments: Oldest generator in aggregate was confirm to be online 08/27/2020 by Rhode Island Energy

A.2 Generation from the Unit meets one of the definitions of New Renewable Energy Resource in RES Regulations Section 3.23.

☒ Yes ☐ No ☐ N/A

Comments: Oldest generator in aggregate was confirm to be online 08/27/2020 by Rhode Island Energy

A.2.1 If Generation Unit is at a new site, adequate documentation is provided to ensure that it first entered commercial operation after December 31, 1997.

☒ Yes ☐ No ☐ N/A

Comments: Oldest generator in aggregate was confirm to be online 08/27/2020 by Rhode Island Energy

A.2.2 If Generation Unit is at the site of an Existing Renewable Energy Resource, adequate documentation is provided to ensure that it first entered commercial operation after December 31, 1997 and that the Existing Renewable Energy Resource has been retired and replaced with such new Generation Unit.

☐ Yes ☐ No ☒ N/A

Comments:

A.2.3 If a Repowered Generation Unit (as defined in Section 3.29 of the RES Regulations – complete replacement of Prime Mover, material increase in efficiency or material decrease in air emissions, and demonstration that at least 80% of resulting tax basis of the entire Generation Unit's plant and equipment is derived from capital expenditures made after December 31, 1997), adequate documentation is provided to ensure that the entire output of said unit first entered commercial operation after December 31, 1997 at the site of existing Generation Unit.

☐ Yes ☐ No ☒ N/A

Comments:

A.2.4 If a multi-fuel facility, adequate documentation is provided to ensure that the renewable energy fraction of output from a Generation Unit in which an Eligible Biomass Fuel is first co-fired with fossil fuels after December 31, 1997.

☐ Yes ☐ No ☒ N/A

Comments:

A.2.5 If Incremental Output from a non-Intermittent Existing Renewable Energy Resource, adequate documentation is provided to ensure that such output is attributable to capital investments for efficiency improvements or additions of capacity that were demonstrably completed after December 31, 1997 and that are sufficient to, were intended to, and can be demonstrated to increase annual electricity output in excess of ten percent (10%) over a Historical Generation Baseline as determined per Section 3.23.v of the RES Regulations.

☐ Yes ☐ No ☒ N/A

Comments:

A.2.6 If Incremental Output from an Intermittent Existing Renewable Energy Resource, adequate documentation is provided to ensure that such output is attributable to capital investments for efficiency improvements or additions of capacity that were demonstrably completed after December 31, 1997 and that are sufficient to, were intended to, and can be demonstrated to increase annual electricity output in excess of ten percent (10%) over a Historical Generation Baseline as determined per Section 3.23.v of the RES Regulations.

☐ Yes ☐ No ☒ N/A

Comments:

B. Eligible Customer-Sited/Off-Grid Generation Facility:
(*see appropriate Sections of RES Regulations, Application Section 5 and Appendix D*)

☒ Yes ☐ No ☐ N/A

B.1 Adequate documentation provided to ensure that NEPOOL GIS Certificates are created by way of an aggregation of Generation Units, physically located in the State of Rhode Island, using the same generation technology (see RES Regulations Section 6.8.i).

☒ Yes ☐ No ☐ N/A

Comments: All generators use solar PV and are located in Rhode Island

B.2 Proposed Aggregation Agreement (as specified in Section 6.8.iii of the RES Regulations) is reasonable and complete.

☒ Yes ☐ No ☐ N/A

Comments: Appendix D contains detailed production reporting details

B.2.1 Aggregation Agreement includes name and contact information of the

aggregator owner. (per Application Appendix D.2.a)

☒ Yes ☐ No ☐ N/A

Comments:

B.2.2 Aggregation Agreement includes name and contact information and adequate evidence of qualifications of the Verifier to ensure that the Verifier will accurately and efficiently carry out its duties. (per Appendix D.2.b)

☒ Yes ☐ No ☐ N/A

Comments:

B.2.2.1 Additional evidence of Verifier qualifications requested and provided. (per Appendix D.2.b)

☒ Yes ☐ No ☐ N/A

Comments:

B.2.3 Aggregation Agreement includes a declaration of any and all business or financial relations between aggregator and Verifier sufficient to ensure the independence of the Verifier in accordance with Section 6.8.iii.c of the RES Regulations (10% or more ownership in voting stock, or family officer/etc.). (per Appendix D.2.c)

☒ Yes ☐ No ☐ N/A

Comments: Sunnova and Solar Edge are not affiliates. SolarEdge does not benefit from the monetization of RECs.

B.2.3.1 Aggregation Agreement includes statement indicating under what circumstances the Verifier would not be considered sufficiently independent of the individual Generation Unit, and that Generation Units not meeting this independence test would not be allowed to participate in the aggregation. (per Appendix D.2.c.1)

☒ Yes ☐ No ☐ N/A

Comments: There is no instance where the verifier would participate in the aggregation. SolarEdge does not monetize RECs

B.2.4 Aggregation Agreement identifies the type of technology that will be included in the aggregation and provides a statement that the aggregation will include only individual Generation Units that meet all the requirements of the RES Regulations (physical location, vintage, etc.). (per Appendix D.2.d)

☒ Yes ☐ No ☐ N/A

Comments: All projects are solar PV

B.2.5 Aggregation Agreement provides an adequate description of proposed operating procedures for the aggregation, by which the Verifier shall ensure that individual Generation Units in the aggregation comply with all eligibility requirements and that the NEPOOL GIS Certificates created accurately represent generation (see Section 6.8.iii.e of the RES Regulations). (per Appendix D.2.e)

☒ Yes ☐ No ☐ N/A

Comments:

B.2.5.1 At a minimum the proposed operating procedures include reasonable and sufficient details for:

- Determining that the Generation Unit exists and is in compliance with RES Regulations and Commission-approved Aggregation Agreement.

  ☒ Yes ☐ No ☐ N/A

- Meter reading procedure that allows the Verifier to verify these readings (manual or remote, via the aggregators own system or an independent system) in a manner fully compliant with NEPOOL GIS Operating Rules regarding metering.

  ☒ Yes ☐ No ☐ N/A

- Specifying how generation data will be entered into NEPOOL GIS to create Certificates.

  ☒ Yes ☐ No ☐ N/A

- Documenting a procedure to verify independently that the GIS Certificates created for the aggregation are consistent with the meter readings.

  ☒ Yes ☐ No ☐ N/A

- Correcting discrepancies in NEPOOL GIS Certificate generation identified by the Verifier.

  ☒ Yes ☐ No ☐ N/A

  Comments: Refer to detailed process documetn

B.2.6 Aggregation Agreement provides an adequate description of how the Verifier will be compensated for its services by the aggregator (in no instance is the Verifier is compensated in a manner linked to the number of NEPOOL GIS Certificates created by the aggregation). (per Appendix D.2.f)

☒ Yes ☐ No ☐ N/A

Comments: Solar Edge does not receive compensation based on number of systems or credits. The reporting is provided with the sale of the inverter or meter.

B.2.7 Aggregation Agreement provides an adequate confirmation and a description of how, no less frequently than quarterly, the Verifier will directly energy into the NEPOOL GIS the quantity of energy production in the applicable time period from each Generation Unit in the aggregation. The entry of generation data by the Verifier must be through an interface designated for this purpose by the NEPOOL GIS and in accordance with NEPOOL GIS Operating Rules applicable to Third-Party Meter Readers, and to which the Aggregation Owner shall not have access. (per Appendix D.2.g)

☒ Yes ☐ No ☐ N/A

Comments: Refer to process document.

C. Generation Unit Location (*see appropriate Sections of RES Regulations,*

Application Section 5 and Appendix E):

C.1 Generation Unit is located in NEPOOL Control Area.

☒ Yes ☐ No

Coordinate Location: 41.84400899749268, -71.35649202661828

C.1.1 Generation Unit is located in Rhode Island.

☒ Yes ☐ No

Facility Address: 237 WILSON AVE, RUMFORD RI 02916

C.2 Generation Unit is located in a control area adjacent to NEPOOL and, in accordance with Section 5.1.ii of the RES Regulations, will apply the associated Generation Attributes to the RES only to the extent that the energy produced by the Generation Unit is actually delivered into NEPOOL for consumption by New England customers.

☐ Yes ☒ No

Comments:

C.2.1 Applicant acknowledges that satisfactory documentation (i.e., a report from neighboring Generation Attribute accounting system or an affidavit) must be provided to verify that Generation Attributes from a Generation Unit located in a control area adjacent to NEPOOL have not otherwise been, nor will be, sold, retired, claimed or represented as part of electrical energy output or sales, or used to satisfy obligations in jurisdictions other than Rhode Island (such assurances may consist of a report from a neighboring Generation Attribute accounting system or an affidavit from the Generation Unit).

☐ Yes ☐ No ☒ N/A

Comments:

C.2.2 Applicant acknowledges that energy delivered from such Generation Unit into NEPOOL will be verified by the following:

- A unit-specific bilateral contract for the sale and delivery of such energy into NEPOOL
- Confirmation from ISO that the energy was actually settled in the ISO Market Settlement System, and
- Confirmation through the North American Reliability Council tagging system that the import of the energy into NEPOOL actually occurred, or such other requirements as the Commission deems appropriate

☐ Yes ☐ No ☒ N/A

Comments:

D. **Eligible Fuel Source – Solar, Wind, Ocean Thermal, Geothermal, or Fuel Cell** (using an eligible renewable resource) (*see appropriate Sections of RES Regulations and Application Section 2.4*):

☒ Yes ☐ No

Fuel Source: Solar

E. **Eligible Fuel Source – Small Hydro Facilities** (*see appropriate Sections of RES Regulations and Application Sections 2.5-2.6*):

☐ Yes ☒ No

E.1 Aggregate capacity does not exceed 30 MW.

☐ Yes ☐ No ☒ N/A

Comments:

E.2 If "New Renewable Energy Resource", applicant acknowledges that facility does not involve any new impoundment or diversion of water with an average salinity of 20 parts per thousand or less.

☐ Yes ☐ No ☒ N/A

Comments:

F. **Eligible Fuel Source – Biomass Facilities** (*see appropriate Sections of RES Regulations, Application Sections 2.7 and Appendix F*):

☐ Yes ☒ No

F.1 Generation Unit uses a biomass fuel source listed in RES Regulations Section 3.7.

☐ Yes ☐ No ☒ N/A

Comments:

F.2 If source is other than RES Regulations Section 3.7-listed, said source has been designated as "clean wood."

☐ Yes ☐ No ☒ N/A

Comments:

F.3 Fuel Source Plan can reasonably be expected to ensure that only Eligible Biomass Fuels will be used, and in the case of co-firing ensure that only that proportion of generation attributable to an Eligible Biomass Fuel be eligible.

☐ Yes ☐ No ☒ N/A

Comments:

F.3.1 Fuel Source Plan specifies the type of Eligible Biomass Fuel to be used.

☐ Yes ☐ No ☒ N/A

Comments:

F.3.2 If proposed fuel is "clean wood", Fuel Source Plan provides adequate substantiation as to why the fuel source should be considered a clean wood.

☐ Yes ☐ No ☒ N/A

Comments:

F.3.3 In the case of co-firing with a fossil fuel, Fuel Source Plan includes an adequate description of how such co-firing will occur and how the relative amounts of Eligible Biomass Fuel and fossil fuel will be measured, and how the eligible portion of generation output will be calculated (with such calculations based on the energy content of the proposed fuels used).

☐ Yes ☐ No ☒ N/A

Comments:

F.3.4 Fuel Source Plan includes an adequate description of what measures will be taken to ensure that only the Eligible Biomass Fuel is used (e.g., standard operating protocols or procedures that will be implemented at the Generating Unit, contracts with fuel suppliers, testing or sampling regimes).

☐ Yes ☐ No ☒ N/A

Comments:

F.3.5 Fuel Source Plan includes adequate assurance that the fuels stored at or brought to the Generation Unit will only be Eligible Biomass Fuels or fossil fuels used for co-firing.

☐ Yes ☐ No ☒ N/A

Comments:

F.3.6 If proposed fuel includes recycled wood waste, Fuel Source Plan provides adequate documentation to ensure that such fuel meets the definition of Eligible Biomass Fuel and also meets material separation, storage, or handling standards acceptable to the Commission and furthermore consistent with the RES Regulations.

☐ Yes ☐ No ☒ N/A

Comments:

F.3.7 Applicant certifies that it will file all reports and other information necessary to enable the Commission to verify the on- going eligibility of the renewable energy generators pursuant to Section 6.3 of the RES Regulations.

☐ Yes ☐ No ☒ N/A

Comments:

F.3.8 A copy of the Generation Unit's Valid Air Permit or equivalent authorization has been attached and the effective date and issuing state or jurisdiction has been identified.

☐ Yes ☐ No ☒ N/A

Comments:

G. Other Comments/Observations: