

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: 11/13/2025

Docket #: RES-25-57

Application Received: 9/30/2025

Generation Unit Information:

Unit Name: Holliston Sand Solar

Unit Owner: Holliston Sand Company, Inc

Unit Size (nameplate MW): .990 AC/1.3 DC **Unit Size (max. demonstrated MW):** .990 AC/1.3874 DC

Location (city, state): North Smithfield, RI

Commercial Operation Date: 03/07/2022

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 #: NON229160) Reject Public Hearing Needed
- Existing Renewable Energy Resource New Renewable Energy Resource
- Capable of Producing as Both Existing & New Renewable Energy Resource

Comments: Approval recommended.

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INCLIME, INC TEAM RECOMMENDATION
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Primary Contact Name, Numbers and Address:

Name and title: William P. Short III, Consultant
Address: PO Box 1168 Slatersville, RI 02876
Phone: 2019703707
Email: w.shortiii@verizon.net

Backup Contact Name, Numbers and Address:

Name and title: Carmine Iacuone, General Manager
Address: PO Box 1168 Slatersville, RI 02876
Phone: 401-766-5010
Email: carmine@hollistonsand.com

Authorized Representative Name, Numbers and Address:

Name and title: William P. Short III, Consultant
Company: Holliston Sand Company, Inc
Address: PO Box 1168 Slatersville, RI 02876
Phone: 201-970-3707
Email: w.shortiii@verizon.net

Owner Name, Numbers and Address:

Name and title: Carmine Iacuone, General Manager
Company: Holliston Sand Company, Inc
Address: PO Box 1168 Slatersville, RI 02876
Phone: 401-766-5010
Email: carmine@hollistonsand.com

Operator Name, Numbers and Address:

Name and title: Carmine Iacuone, General Manager
Company: Holliston Sand Company, Inc
Address: PO Box 1168 Slatersville, RI 02876
Phone: 401-766-5010
Email: carmine@hollistonsand.com

RENEWABLE ENERGY RESOURCES ELIGIBILITY DETAILED
INCLIME, INC TEAM APPLICATION REVIEW RESULTS

(Template V10 – November 9th, 2016)

Date of Final Review: 11/13/2025

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:

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:

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:

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:

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:

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: Carmine Iacuone, Holliston Sand Company, Inc, PO Box 1168, Slatersville, RI 02876, 201-970-3707, w.shortiii@verizon.net

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: Bill Short, William P Short III, PO Box 237173, New York, NY 10023, 201-970-3707, w.shortiii@verizon.net

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

Yes No N/A

Comments: The Independent Verifier of the solar facility output and resultant certificates will be Mr. William P. Short III, Master Meter Reader. Mr. Short has the following qualifications: • Undergraduate and graduate degrees in electrical engineering from Duke University and University of Pennsylvania, respectively; • Participant in the drafting of and knowledgeable about the Massachusetts Renewable Portfolio Standard regulations, including its Third-Party Meter Reader (now, Independent Verifier) regulations; • Participant in the drafting of and knowledgeable about all other New England states renewable portfolio standards, either at the legislative or regulatory levels; • Participant in the drafting of and knowledgeable about the Operating Rules of the NEPOOL Generation Information System; • Qualified Third-Party Meter Reader (now Independent Verifier) in Rhode Island, Independent Monitor in New Hampshire and Verifier in Connecticut. (There is no equivalent requirement in Maine); •

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: Mr. Short has no direct or indirect ownership interest in Holliston Sand Company, Inc. (“Holliston”) or any affiliate of this entity. Neither Mr. Short nor any immediate family member is an officer, director, partner, employee or representative of Holliston. Mr. Short’s business relationship with Holliston is solely that of an independent consultant. Among his duties for Holliston are the following: Holliston may request that Mr. Short assist Holliston with the registration, creation and sale of the NEPOOL GIS certificates generated by its solar generating facility, located in North Smithfield, Rhode Island (the “Solar Generating Facility”). Specifically, on Holliston’s behalf, Mr. Short will register its Solar Generating Facility with the NEPOOL GIS. Mr. Short will also assist Holliston in marketing its NEPOOL GIS certificates. Included in this work, Mr. Short will offer the NEPOOL GIS certificates directly to New England Distribution Companies in their periodic REC auctions,

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:

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: The Solar Generating Facility is a 995 KV solar photovoltaic facility of which the facility includes only individual units that meet all of the requirements of the RI RES regulations; such as, physical location and vintage.

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: Mr. Short will at least quarterly access the Facility's on-line reporting system and determine the monthly production and compare its production to its lifetime records. Once Mr. Short verifies that production as being reasonable, he will enter it into his records for the Facility and upload it into the GIS.

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:

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: Since Mr. Short is paid a fixed fee for his services, there is no way, unless his consulting agreement is modified, that he cannot be qualified as an Independent Verifier (formerly, Third-Party Meter Reader). If Mr. Short's business relationship should change with Holliston (for example, if he were to become an officer, director, partner, employee or representative of Holliston or, if he were to be paid based upon production by the Solar Generating Facility), Holliston will immediately inform the RI PUC of such modifications. During the term of consulting agreement, Mr. Short will be paid a flat, fixed fee for his services. His agreement, which runs until the end of the 2027 Compliance Year, can be terminated by Holliston at any time without cause provided that Mr. Short has been paid the remaining balance of his fixed fee. None of Mr. Short's compensation will be subject to adjustment for the increase or decrease in production of Certificates by the Solar Generating Facility.

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: • Mr. Short has visually seen the Solar Generating Facility. He can, therefore, independently provide an opinion that the Facility exists. • Mr. Short will take meter readings as frequently as monthly. He will verify quarterly the generator meter readings. • Mr. Short will directly input the generation data directly into the NEPOOL GIS website. • Mr. Short will respond promptly to any RI PUC questions, surveys or reports requested. • Mr. Short will report any unexplained deviation in production from the Solar Generating Facility to the RI PUC. Mr. Short will at least quarterly access the Facility's on-line reporting system and determine the monthly production and compare its production to its lifetime records. Once Mr. Short verifies that production as being reasonable, he will enter it into his records for the Facility and upload it into the GIS.

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:

C.1.1 Generation Unit is located in Rhode Island.

Yes No

Facility Address: 77 Tift Road North Smithfield, RI 02896

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: