

October 28, 2011

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 4277 - Revised Distributed Generation Enrollment Application and Process Rules & Responses to Comments

Dear Ms. Massaro:

On behalf of National Grid¹ I am filing the enclosed Revised Distributed Generation Enrollment Application and Enrollment Process Rules, which reflects changes and clarifications that the Company has agreed to make, as it responded to comments and discovery in this matter. The Company is submitting redlined and clean versions of the above.

I have also enclosed a table that captures comments made by various parties to this proceeding and the Company's responses to those comments.

Thank you for your attention to this matter. If you have any questions regarding this filing, please feel free to contact me at (401) 784-7667.

Very truly yours,



Thomas R. Teehan

Enclosures

cc: Docket 4277 Service List
Steve Scialabba
Leo Wold, Esq.

¹ The Narragansett Electric Company d/b/a National Grid.

REDLINED VERSION

**Rhode Island Renewable Distributed Generation
Standard Contract Enrollment Application and Enrollment
Process Rules**

Rhode Island Renewable Distributed Generation Standard Contract Enrollment Application and Enrollment Process Rules

I. Introduction and Overview

1.1 Purpose of the Enrollment

The Narragansett Electric Company d/b/a National Grid (“National Grid”) or the “Company”), is seeking applications to enter into standard contracts for the supply of electric capacity and energy and Renewable Energy Certificates and related attributes (including Certificates issued in the New England Power Pool Generation Information System) (collectively, “RECs”) from eligible Distributed Generation projects pursuant to Chapter 26.2 of Title 39 of the Rhode Island General Laws, entitled Distributed Generation Standard Contracts Act (the “Act”), which became effective June 29, 2011, and solicitation and enrollment process rules promulgated thereunder. In addition, National Grid is conducting this enrollment in accordance with the Rules and Regulations Governing Long-Term Contracting Standards for Renewable Energy (the “Regulations”) promulgated under Chapter 26.1 by the Rhode Island Public Utilities Commission (“Commission”), which became effective January 28, 2010.¹ In the enrollment period for the current program year, National Grid is soliciting capacity, energy, RECs and all other environmental attributes and market products that are available or may become available from Distributed Generation facilities pursuant to standard contracts for fifteen (15) year terms.

1.2 Statutory Framework

Pursuant to the provisions of the Act, National Grid is required to procure 10% of the minimum long-term contract capacity under the long-term contracting standard for renewable energy in section 39-26.1-2, or 9 MW, based on annual class targets set by the Board² and approved by the Rhode Island Public Utilities Commission (“Commission”). National Grid shall enter standard contracts for an aggregate nameplate capacity of at least 40 MW of Distributed Generation projects by the end of 2014, as set forth in the following four (4) year schedule:

By December 31, 2011: a minimum of five megawatts (5 MW) nameplate capacity
By December 31, 2012: a minimum aggregate of twenty megawatts (20 MW)
nameplate capacity
By December 31, 2013: a minimum aggregate of thirty megawatts (30 MW) nameplate
capacity

¹ Except as expressly differentiated in the Act, the standard contracts entered into shall be treated for all purposes as long-term contracts entered into under the provisions of the long-term contracting standards for renewable energy found in chapter 26.1 of Title 39 of the Rhode Island General Laws, and all such provisions shall apply to such contracts. R.I.G.L.. §39-26.2-9.

² The Distributed Generation Standard Contract Board, or if not yet constituted, the Rhode Island Office of Energy Resources.

By December 31, 2013: a minimum aggregate of forty megawatts (40 MW) nameplate capacity

Thus, under a single enrollment in 2011, the initial program year, National Grid must enter standard contracts for a minimum of 5 MW nameplate capacity. Thereafter, the Company must conduct three enrollments annually. Each enrollment will be open for a two-week period. National Grid is not required to enter into more than one-third of the annual target per enrollment, with the exception of the 2011 program year. The attached Schedule 1 sets out a schedule of anticipated dates for the 2011 Enrollment process. The classes and annual targets for the 2011 program year are listed in Schedule 2 of this application.

1.2.1 Applications

Applicants are required to complete and submit a short-form application ("Application") which Application shall require the applicant to provide the project owner's identity and the project's proposed location, nameplate capacity, and renewable energy class and, as described in Section II below, allows for additional information including information relative to the permitting, financial feasibility, ability to build, and timing for deployment of the proposed projects. For large distributed generation projects the Application also requires the applicant to bid a fixed bundled price for the sale of the energy, capacity, renewable energy certificates, and all other environmental attributes and market products that are available or may become available from the distributed generation facility on a fixed per kilowatt-hour basis for the output of the project. The Application to be used by applicants in this enrollment is attached as Attachment A.

Successful applicants will be selected in accordance with the process set forth in this application, which encompasses the solicitation and enrollment process rules. Standard contracts will be finalized between National Grid and successful applicants, based on the ceiling prices and annual targets for each renewable energy technology class set by the Board and approved by the Commission. A blank Standard Contract, which has been approved by the Commission, is included in this application as Appendix B. Applicants are responsible for reading and understanding the Standard Contract to the extent necessary to submit an application, and to promptly execute this contract if selected in the enrollment. There will be no exceptions to the Standard Contract.

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1.2.2 Eligibility Requirements

To be eligible under this enrollment, a distributed generation facility must be a "newly developed renewable energy resource" under the Long-Term Contracting Standard and the Regulations. A "newly developed renewable resource" is defined as an electric generation unit that uses exclusively an eligible renewable energy resource (as defined under R.I.G.L. § 39-26-5 and Section 5 of the Rules and Regulations governing the Implementation of a Renewable Energy Standard, effective July 25, 2007), that has neither begun operation, nor have the developers completed financing

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for construction.³ The eligible technologies include biogas generated as a result of anaerobic digestion, but specifically exclude all other listed biomass fuels. Further, the unit must be located in the [Narragansett Electric Company ISO-NE](#) load zone, with a nameplate capacity no greater than five (5) MW, and be connected to the electric distribution company's power system.

a. Small Distributed Generation Projects

National Grid shall enter into standard contracts for fifteen (15) year terms at the applicable Ceiling Price with Small Distributed Generation projects on a first-come first-serve basis, provided the applicants meet the minimum threshold requirements set forth in this application and enrollment process rules. If there are more small projects than what is specified for a class target, National Grid shall review the applications submitted, and select first those projects that appear to be the furthest along in development and most likely to be deployed utilizing a competitive non-price scoring method described later. Small Distributed Generation Projects must have a nameplate capacity no larger than the following: Solar: 500 kW; Wind: 1.5 MW; and Other Technologies: 1 MW. The applicant must submit an affidavit confirming that the project is not a segment of a larger project.

b. Large Distributed Generation Projects

Large Distributed Generation projects must bid a fixed bundled price for the sale of energy, capacity, and renewable energy certificates ("RECs") and all other environmental attributes and market products that are available or may become available from the distributed generation facility on a per kilowatt-hour basis for the output of the project for a contract term of fifteen (15) years. Alternative Pricing is allowed for a contract term different than fifteen (15) years, but the Applicant must demonstrate why the alternative term is appropriate, and if the Company agrees to the different term it must be approved by the Commission. Selection will be based on the lowest price received and on competitive non-price scoring, but not to exceed the applicable ceiling price, provided the applicants meet the minimum threshold requirements set forth in this application. Large Distributed Generation Projects are larger than the Small Distributed Generation Project sizes set forth above, but are no greater than 5 MW.

II. Bid Evaluation and Selection Criteria and Process

2.1 Overview of Bid Evaluation and Selection Process

Applications received by National Grid, will be subject to a consistent and defined review, evaluation and selection process. [All projects will be evaluated only against other projects submitted in the same approved class for that current enrollment.](#) The first stage consists of a review of whether the bids satisfy specified eligibility and

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³ Under Section 3.16 of the Regulations, projects located within the State of Rhode Island which obtained financing on or after January 1, 2009, which have not begun operation, would also be considered a "newly developed renewable energy resource."

minimum threshold requirements. National Grid will conduct any additional evaluation as required, consistent with the requirements set forth above, and select applicants for execution of Standard Contracts. Consultation with the Rhode Island Office of Energy Resources and/or the Rhode Island Division of Public Utilities and Carriers may also be utilized in this further assessment. Applicants selected by National Grid will be required to indicate in writing whether they intend to proceed with their proposals within five business days of being notified, and to execute contracts within two business days thereafter. All executed contracts will be filed with the Commission.

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2.2 Interconnection Progress Prior to Enrollment

The Act requires that the distributed generation facility owner be liable for the cost of interconnection, and sufficient progress in the interconnection process must be made prior to the enrollment. Project owners must have submitted an Interconnection application and have a completed Feasibility study as defined in the Rhode Island Distributed Generation Interconnection Act and The Narragansett Electric Company Standards for Connecting Distributed Generation, and must provide copies with this application for enrollment. If the project has a completed Impact study, this would also be acceptable, since it is a more comprehensive study.

Information regarding Interconnection of Generators in Rhode Island can be found at the following link:

https://www.nationalgridus.com/narragansett/business/energyeff/4_interconnect.asp

2.3 Minimum Threshold Requirements

The Distributed Generation Standard Contracts Act requires that Standard Contracts include a requirement that distributed generation facility owners make a performance guarantee deposit to National Grid. Should the distributed generation facility not produce the output proposed in its enrollment application within eighteen (18) months of contract execution, the contract is automatically voided, and the performance guarantee deposit is forfeited. It is a threshold requirement, therefore, that the construction schedule for a project lead to accomplishment of this critical milestone within eighteen months of contract execution.⁴

As a second threshold requirement, project developers submitting applications must have also submitted applications for interconnection and received a Feasibility study, or an Impact study, which should be submitted as part of the application.

⁴ The performance guarantee deposit is fifteen dollars (\$15.00) for small distributed generation projects and twenty-five dollars (\$25.00) for large distributed generation projects for every renewable energy certificate (REC) estimated to be generated per year under the contract, but at least five hundred dollars (\$500) and not more than seventy-five thousand dollars (\$75,000), paid at the time of contract execution. Should this milestone be achieved, the deposit shall be refunded, without interest, on a prorated basis of renewable energy actually delivered over the course of the first year of the project's operation.

Applications that meet all the eligibility requirements and the above minimum threshold requirements will be further evaluated to determine compliance with a broader set of requirements, which have been designed to screen out proposals that are insufficiently mature from a project development perspective; lack technical viability; or fail to satisfy minimum standards for bidder experience and ability to finance the proposed project. The categories of information necessary to [complete this further evaluation](#), are set forth below.

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- o Energy Resource Plan
- o Financial/Legal Capability
- o Site Control
- o Permit Acquisition Plan
- o Interconnection
- o Technical/Engineering
- o Project Schedule
- o Project Management and Experience
- o Economic Benefit to Rhode Island

National Grid is interested in projects that can demonstrate the ability to develop, permit, finance, and construct the proposed project within the required eighteen month schedule.

Applicants must use this application to provide responses. Applicants are [requested](#) to provide [all reasonably available](#) information in each section of the application. If any of the information requested is inconsistent with the type of technology or product proposed, the Applicant should include "N/A" and describe the basis for this designation. It is anticipated that larger projects may provide a higher level of detail in the responses than smaller projects. It is emphasized however, that Applicants who do not provide complete and credible information in any of the above categories, [will be scored accordingly in the Scoring Process](#). The forms are included in this Application in MS Word format as Appendix A.

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2.4 Project Scoring

In conducting evaluations of each project, National Grid will employ the scoring methodology described in Schedule 3. The non-price evaluation criteria are designed to assess the likelihood of a project coming to fruition based on various factors critical to successful project development. The objectives of the criteria are to provide an indication of the feasibility and viability of each project and the likelihood of meeting the proposed commercial operation date. Applications that can demonstrate, based on the current status of project development and past experience, that the project will likely be successfully developed and operated as proposed will have a higher likelihood of success.

For Small Distributed Generation projects, National Grid plans to weight completion schedule at fifty percent (50%) and non-price factors at fifty percent (50%). For Large Distributed Generation projects, price is weighted at eighty percent (80%) and non-price factors at twenty percent (20%).

National Grid reserves the right to reject any project not receiving a minimum score in the non-price evaluation, regardless of the completion date or pricing.

If the situation arises where multiple projects share the same interconnection facilities, and in the event that such projects receive equivalent scores in the evaluation, the project with the earliest interconnection application will be taken first. In addition, National Grid will reject any application for which interconnection is not technically feasible.

2.5 Projects at Customer Sites Involving Net Metering

A distributed generation project that is also being employed by a customer for net metering purposes may submit an application to sell the excess output from the project.⁵ In this case, the applicant must be the project owner. The class in which the project is submitted is determined by the total project size, and not by the excess output offered for sale under a Standard Contract. The application forms in Appendix A require that both the project size and the excess output being offered for sale be specified.

2.6 Coordination with Annual Solicitations under the Long-Term Contracting Standard

The DG Enrollment process is separate and distinct from the annual competitive solicitations conducted under the Long-Term Contracting Standards. National Grid will provide reports to the Commission on both the solicitation and the annual enrollment process in order to track compliance with the Long-Term Contracting Standard. Projects submitted, but not yet selected, in an annual solicitation under the Long-Term Contracting Standards, may be submitted in a Distributed Generation enrollment. In this case, should the submitted pricing in one of the large DG classes be higher than that submitted in the competitive solicitation, a fully documented explanation must be provided. Additionally, the Applicant agrees that entering into a DG Standard Contract will automatically rescind the Applicant's bid relative to that project in the annual solicitation under the Long-Term Contracting Standards.

2.7 Delivery of Energy into ISO-NE Market

Energy will be delivered to National Grid in the [Narragansett Electric Company ISO-NE load zone](#) at the delivery node associated with the distributed generator. This will be accomplished through registration of the generator as a generation asset and assignment of the energy to National Grid.

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2.8 Participation in ISO-NE Forward Capacity Market (FCM)

⁵ In such case, at the election of the self-generator all of the renewable energy certificates pertaining to the energy consumed on site may be sold on a month-to-month basis outside of the terms of the standard contract.

National Grid shall be the "Project Sponsor" for all Large Distributed Generation Facilities and may qualify the Facility as an Existing Capacity Resource in the Forward Capacity Market (FCM) after the Commercial Operation Date and participate in every Capacity Commitment Period in the FCM with respect to the Facility. National Grid also reserves the right to be the "Project Sponsor" for Small DG Facilities, after consultation with the Division and the Board. If and when National Grid participates as "Project Sponsor" on behalf of any Facility, that Facility must support National Grid, as required, to qualify the Facility as an Existing Capacity Resource in the Forward Capacity Market. Generation owners are required to take commercially reasonable actions to maximize performance against any FCM Capacity Supply Obligations.

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Deleted: While the ceiling prices are bundled prices for capacity, energy and RECs, National Grid will require that distributed generation owners submitting projects in this enrollment, act as ISO-NE lead market participant in administration of the project in the FCM. Delivery of capacity and National Grid's purchase of capacity will be solely through financial settlement pursuant to the provisions of the Standard Contract.

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Deleted: In settlement of monthly invoices with the project owner, National Grid will deduct FCM capacity revenues which the project owner received (or should have received) directly from ISO-NE.

2.9 RPS Qualification and NEPOOL Generation Information System ("GIS") Certificates

The Distributed Generation projects must obtain qualification as a renewable resource per the Rhode Island Renewable Energy Standard ("RES"), and it must register as a Participant Account Holder with the NEPOOL-GIS. Once qualified, National Grid must be designated to receive all of the RECs produced by the project and tracked in the NEPOOL-GIS⁶ under the operating rules found at http://www.iso-ne.com/committees/comm_wkgrps/mrks_comm/geninfo_sys/operating/index.html

2.10 Official Contact for the Enrollment

Any questions on the Enrollment should be directed to the attention of the Official Contact for National Grid at the address listed below:

Corinne Abrams
Manager, Environmental Transactions
Energy Procurement
National Grid
100 East Old Country Road
Hicksville, NY 11801
(516) 545-5435

Questions may be submitted to the Official Contact at following email address:
corinne.abrams@us.ngrid.com

2.11 Submittal of Enrollment Applications

The Standard Contract Enrollment Application and Appendices are posted on the National Grid energy supply procurement website.

⁶ [The Rhode Island Distributed Generation Standard Contract Act requires that an electric meter which conforms with standard industry norms be installed to measure the electrical energy output of the distributed generation facility, and require a system or procedure by which the distributed generation facility owner shall demonstrate creation of renewable energy credits, in a manner recognized and accounted for by the GIS; such demonstration of renewable energy credit creation to be at the distributed generation facility owner's expense.](#)

http://www.nationalgridus.com/energysupply/current_procurement.asp.

Completed applications should be submitted electronically following the instructions on the site for the Rhode Island Standard Contract Enrollment for renewable energy. Electronic submittal will assure that the time of submittal is documented.

Schedule 1

Event	Anticipated Dates
Enrollment begins	<u>December 1, 2011</u>
Due Date for Submission of Applications	<u>December 14, 2011 5PM EPT</u>
Execute Contracts	December <u>30</u> , 2011
File Contracts with PUC	<u>January 6, 2012</u>

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Note: Schedule 1 to be updated as required for each enrollment period.

Schedule 2
Classes and Targets Applicable to Current Enrollment Period

Class	Target (kW)	Ceiling Price
Small Solar (< 500 kW)		
Large Solar (>500 kW; < 5 MW)		
Small Wind (<1.5 MW)		
Large Wind >1.5 MW; <5 MW		
Other Technologies (Small) <1.0 MW		
Other Technologies (Large) >1.0 MW; <5 MW		

Note: Schedule 2 to be updated as required for each enrollment period.

**Schedule 3
Project Evaluation and Scoring Methodology**

Non-Price Scoring for All Projects (20 points)

Non-price scoring is the same methodology employed National Grid in the initial competitive solicitation, and documented in the report on that solicitation, filed with the RI PUC on April 11, 2011. The scoring methodology is summarized as follows, and is based on the responses in Appendix A.

Evaluation Factors	Max Points	Criteria Considered in Each Factor
A. Siting and Permitting	4.0	<ul style="list-style-type: none"> • Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways (1.5 points) • Identification of required permits and approvals and status of plan to obtain permits and approvals (1.5 points) • Community relations/support (1.0 points)
B. Project Development Status and Operational Viability	6.0	<ul style="list-style-type: none"> • Reasonableness of critical path schedule and demonstrated ability to meet major milestones (1.5 points) • Credibility of energy resource plan (1.5 points) • Commercial access to and reliability of the proposed technology (1.0 points) • Progress in interconnection process (2.0 points)
C. Experience and Capability of Bidder and Project Team	3.0	<ul style="list-style-type: none"> • Project development experience (1.0 points) • Project financing experience (1.0 points) • Operations and maintenance experience (1.0 points)
D. Financing	4.0	<ul style="list-style-type: none"> • Credibility of the financing plan (2.0 points) • Financial strength of the bidder (2.0 points)
E. Economic Benefit	3.0	<ul style="list-style-type: none"> • Project provides direct employment benefits (1.0 points) • Project provides indirect employment benefits (1.0 points) • Project provides tax revenues or other similar revenues (1.0 points)
Total	20.0	

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Score on Completion Date for Small Projects (20 points)

For each class, the project with the nearest completion date (commercial operation) will receive 20 points. Other projects will receive a deduction of two points per month of additional schedule duration.

Score on Submitted Price for Large Projects (80 points)

For each class, the project with the lowest price relative to the ceiling price will receive 80 points. For other projects, one point will be deducted for each \$MWh higher than the lowest submitted price.

Total Scoring

Small Projects	
Non-Price Scoring	20
Score on Completion Date	20
Total	40
Large Projects	
Price Scoring	80
Non-Price Scoring	20
Total	100

For small projects, the scoring methodology is intended to discriminate between a project with a near-term completion date, and a “credible” project with a near-term completion date, that is most likely to be deployed.

For large projects, the scoring methodology is intended to discriminate between a project with competitive pricing, and a “credible” project with competitive pricing, that is most likely to be successfully deployed.

National Grid reserves the right to reject any project not receiving a minimum score in the non-price evaluation, regardless of the completion date or pricing.⁷

⁷ There is the possibility that projects might meet (or even exceed) the threshold requirements, yet not make a credible demonstration that the project is likely to be completed and operated as proposed. It is not feasible to establish such a score in advance, as non-price scoring as a general matter is often driven by how projects compare on a relative basis. It would be expected, however, that some projects may clearly rank well below others in the same, or similar classes.

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**Rhode Island Renewable Distributed Generation
Standard Contract Enrollment Application
Appendix A**

Rhode Island Renewable Distributed Generation Standard Contract Enrollment Application Appendix A

1. Authorized Representative's Signature Certification Form

The undersigned is a duly authorized representative of the Project listed below. The Representative hereby certifies that all the statements and representations made in this Application are true and accurate to the best of the Applicant's knowledge. The Applicant represents that it understands the requirements, terms and conditions of the Standard Contract. The Applicant certifies under the pains and penalties of perjury that the project submitted is not a segment of a larger [newly developed](#) project, which would not otherwise fall under the provisions of this Application.

Submitted by: _____
(Exact Legal Entity)

Project Owner: _____
(If different than above)

Signature of Authorized
Representative: _____

Title: _____

Date Signed: _____

2. Project Summary/Contact Information

Note: unless otherwise noted, all electric capacity and energy figures provided should be AC

Applicant Name: _____

Project Name: _____

Project Class:
(See Schedule 2) _____

Enrollment Period: _____

Estimated Commercial
Operation Date: _____

Project Site/Location
City or Town: _____

Proposed Interconnection Point: _____

Date of Interconnection
Application: _____

Proposed Point of Delivery: _____

Project Contact
Name: _____

Address: _____

Phone Number: _____

Email Address: _____

Facsimile Number: _____

Total capacity of the Project
(MW):

Gross: _____
Nameplate DC Rating (if solar) _____
:
Net _____

Contract Maximum Amount available for Delivery to National Grid (at the Point of Delivery (kWh AC per hour)¹: _____

Expected Annual Energy Production to be delivered to National Grid at the Point of Delivery (MWh AC): _____

Estimated Net Capacity Factor (%): _____

Study Provided to Support Estimated Generation: _____(Yes) _____(No)

If Yes, Name of Firm Who Prepared the Study: _____

Expected Annual Availability (%): _____

Term of Contract: _____

Estimated Equipment Life: _____

Equipment Manufacturer: _____

Interconnection Application No.: _____

Project Type:
(Check as applicable) _____ Non-Firm Intermittent Energy
_____ Baseload Energy

¹ If net metering, distinguish between total project generation and deliveries to the electric distribution system.

3. Pricing Information (Applicable to Large Projects only)

This section is applicable only to Large Projects. Pricing must be submitted as a fixed bundled price for the sale of energy, capacity, and renewable energy certificates (RECs) on a per kilowatt-hour (\$/kWh) basis for the output of the project over the contract term of fifteen (15) years.

Price² (\$/kWh): _____ (to five decimal places)

Alternative Pricing is allowed for a contract term different than fifteen (15) years, but the Applicant must demonstrate why the alternative term is appropriate.

Alternative Contract Term (years): _____

Alternative Price (\$/kWh): _____

²Projects submitted, but not yet selected, in an annual solicitation under the Long-Term Contracting Standards, may be submitted in a Distributed Generation enrollment. In this case, should the submitted pricing in one of the large DG classes be higher than that submitted in the competitive solicitation, a fully documented explanation must be provided here in Section 3. Additionally, the Applicant agrees that entering into a DG Standard Contract will automatically rescind the Applicant's bid relative to that project in the annual solicitation under the Long-Term Contracting Standards.

4. Operational Parameters

Note: all electric capacity and energy figures provided should be AC

Applicants should provide the following information requested regarding the project operational parameters and general project information. If information requested is not applicable to the specific technology, the Applicant should specify with an N/A.

4.1. Operating Characteristics

4.1.1. Nameplate Capacity: _____ MW

Net Capacity at Average Site conditions: _____ MW

4.1.2. Expected Capacity to be Qualified in the ISO-NE Forward Capacity Market³

Winter: _____ MW

Summer: _____ MW

4.1.3. Energy Generation

Expected Gross Annual Energy Production: _____ MW/yr

Expected Net Annual Energy Production: _____ MW/yr

Expected Peak and Off-Peak Monthly Production⁴

Month	On-Peak (MWh/Month)	Off-Peak (MWh/Month)
January		
February		
March		
April		
May		
June		
July		
August		

³ Expected capacity to be qualified in each capability period using the specific conventions applicable to the project type, i.e. conventional or intermittent generator. Please see the following ISO-NE rules, procedures and manuals for a more complete description: OP-14 Technical Requirements for Generators, Demand Resources, and Asset Related Demands; M-RPA Registration and Performance Auditing; M-20 Forward Capacity Market; M-11 Market Operation; and OP-18 Metering and Telemetering Criteria. The overall market tariff is Market Rule 1.

⁴ If the level of generation is expected to vary over the life of the Standard Contract, the Applicant should provide an expanded table for the term of the Standard Contract.

September		
October		
November		
December		
Total		

4.1.4. Annual Degradation Rate (if any) and basis for it: _____

4.1.5. Expected Operating Life of the Project (years): _____

4.2. Operating Mode

Proposed method/mode of Operation

Intermittent Only
(Please define parameters of operation) _____

Must Run (at full load) _____

4.3. Maintenance Outage Requirements

Specify partial and complete planned outage requirements in weeks or days. Also, list the number of months required for the cycle to repeat (e.g., list time interval of minor and major overhauls, and the duration of overhauls.

5. Energy Resource Plan

The Applicant is required to provide an energy resource or fuel supply plan for its proposed project, including supporting documentation. The fuel supply/energy resource profile information should be consistent with the type of technology/resource option proposed and the term of the Standard Contract proposed. The information requested is organized according to the type of project or energy resource. Applicants should respond only to relevant questions.

The Energy Resource Plan should provide a reliable basis for translation of nameplate capacity to contract capacity under the Long-Term Contracting Standard.

Wind Energy Projects:

- Provide a summary of all collected wind data for the proposed site. Identify when the data was collected and by whom.
- Indicate where the data was collected and its proximity to the proposed site. Include an identification of the location for the anemometers and/or other wind speed measurement devices that were used to arrive at an assessment of the site generation capability.
- Provide (a) at least one year of hourly wind resource data, or (b) a wind resource assessment report from a qualified resource assessment firm or meteorologist, or (c) both. Include an analysis of the available wind data which addresses the relationship between wind conditions and electrical output.
- Provide a projection of gross and net annual energy production, including projections of average net hourly energy production, based on the wind resource data (a 12 x 24 energy projection).
- Please provide an explanation if the average of the hourly MWh of production is different from the expected Net Annual Energy Production.
- Provide a site-adjusted power curve. Each curve should list the elevation, temperature and air density used.
- Identify the assumptions for losses in the calculation of projected annual energy production, including each element in the calculation of losses.

Biomass (limited to Anaerobic Digestion Biogas):

- Provide a resource assessment of available biomass fuel for the proposed project and its proximity to the project site.
- Provide a plan for obtaining the biomass fuel or feedstock, including a transportation plan.
- Provide any contracts or letters of intent to acquire and transport the biomass fuel or feedstock.

- Demonstrate that projected energy output for the project over the term of the contract is consistent with the energy supply available.
- Describe any contingencies or constraints that could affect the availability of fuel or the energy resource for the project and any contingency plans for meeting projected generation levels

Solar:

- Provide an assessment of the available solar incidence or resource and the projected production profile for the project. Identify anticipated generation by hour and month for at least a one-year period and describe any trends in generation capability over time (i.e. annual decline rate of expected output).
- Describe the methodology used to generate the projected generation and describe the in-house or consulting expertise used to arrive at the generation estimates. Use of "PV Watts," a solar PV generation estimation tool developed by the National Renewable Energy Laboratory (NREL) is acceptable, with sufficient explanation of chosen inputs to the calculator.

Hydro:

- Describe the project characteristics in terms of water flow (on a monthly basis) and head, and state the assumptions regarding seasonal variations, and a conversion of such flow into kilowatts and kilowatt-hours. Provide monthly flow duration curves based upon daily stream flow records.
- Identify if the project is run-of-river or has storage capability.
- If the project is an expansion of an existing project, (a) provide energy output estimates with and without the proposed expansion and (b) specify the quantity of energy that would qualify as RPS Class I Renewable Generation and the actions proposed to be taken by the Applicant to accomplish such qualification.

6. Financial/Legal

Applicants are required to provide responses to all questions below. Applicants are required to demonstrate the financial viability of their proposed project. Applicants should provide the following information:

- 6.1. Provide a description of the structure of the Applicant's organization from a financial and legal perspective, including any general and limited partners, officers, directors, managers, members and shareholders, involvement of any subsidiaries supporting the project, and the providers of equity and debt during project development. Provide an organization chart showing the relationship between the equity participants and an explanation of the relationships.
- 6.2. Provide a description of the financing plan for the project, including construction and term financing. The financing plan should address the following:
 - Who will finance the project and how it will be financed
 - The project's planned permanent financial structure
 - Expected sources of debt and equity financing
 - Estimated construction costs and arrangements for construction financing
 - Describe any agreements entered into with respect to equity ownership in the proposed project and any other financing arrangement.

In addition, the financing plan should address the financing of development costs. All Applicants are required to provide this information.

- 6.3. Provide documentation illustrating the experience of the project sponsor in securing financing for projects of similar size and technology. For each project (up to the 10 most recent, if applicable) previously financed provide the following information:
 - Project name and location
 - Project type and size
 - Date of construction and permanent financing
 - Form of debt and equity financing
- 6.4. Provide evidence that the Applicant has the financial resources and financial strength to complete and operate the project as planned.

- 6.5. The Applicant should demonstrate its ability (and/or the ability of its credit support provider) to provide the required security, including its plan for doing so.
- 6.6. Provide a description of any current credit issues regarding the Applicant or affiliate entities raised by rating agencies, banks, or accounting firms.
- 6.7. Describe the role of the federal Production Tax Credit or Investment Tax Credit (or other incentives) on the viability of the project.
- 6.8. Applicants must disclose any pending or threatened litigation related to projects owned or managed by them or any of their affiliates in the United States.

7. Siting and Interconnection

This section of the response package addresses project location, siting, real property rights and interconnection issues. Applicants should ensure that the threshold criteria for siting are verified in their responses.

- 7.1. Provide a site plan including a map of the site that clearly identifies the location of the property, the location of the generation facility on the site, the total acreage, the anticipated interconnection point, and the relationship of the site to other local infrastructure, including transmission facilities, roadways, and water sources. In addition to providing the required map, provide a site layout plan which illustrates the location of all major equipment and facilities on the site.
- 7.2. Provide evidence of the right to use the site.
- Does the project have a right to use the site (e.g., by virtue of ownership or land rights obtained from the owner)?
 - If so, please identify the means of site control.

Include any relevant documentation, e.g., lease agreement, option to lease, purchase agreement, option to purchase, or letter of intent regarding any of the foregoing.

- 7.3. Provide evidence that the project is consistent with the zoning of the site, and not subject to any other restrictions. If there are zoning or other restrictions, identify present and required zoning and/or land use designations, identify any restrictions, and provide a permitting plan and timeline to secure the necessary approvals.

Deleted: is properly zoned.

Deleted: the site is not currently zoned properly,

Deleted:

- 7.4. Provide a description of the area surrounding the site including a description of the local zoning, flood plain information, existing land use and setting (woodlands, grasslands, agriculture, other).

- 7.5. Identify any real property rights (e.g., fee-owned parcels, rights-of-way or easements) that are required for access to the project or for interconnection. Describe the status of acquisition of real property rights, and describe the plan for securing the necessary real property rights, including the proposed timeline. Include these plans and the timeline in the overall project timeline.

- 7.6. Provide a copy of the interconnection application. Provide a copy of the Feasibility study and/or Impact study, as defined by the Rhode Island Distributed Generation Interconnection Act, completed to date. Provide a copy of an interconnection services agreement, if executed by the Applicant with respect to the proposed project.

Deleted: and a copy of any screening memos, or executed study agreements.

Deleted: any,

- 7.7. Provide a copy of an electrical one-line diagram showing the interconnection facilities and the relevant transmission or distribution facilities.
- 7.8. Specify and describe the interconnection and transmission or distribution facilities that are required, including system control and protection.

8. Environmental Assessment and Permit Acquisition Plan

This section addresses environmental and other regulatory issues associated with project siting, development and operations.

- 8.1. Provide a list of all the permits, licenses, and environmental assessments and/or environmental impact statements required. If a Applicant has secured any permit or has applied for a permit, please identify in the response.
 - Provide a list of all Federal, state and local permits, licenses, and environmental assessments and/or environmental impact statements required to construct and operate the project.
 - Identify the governmental agencies which will issue or approve the required permits, licenses, and environmental assessments and/or environmental impact statements.
- 8.2. Provide the anticipated timeline for seeking and receiving the required permits, licenses, and environmental assessments and/or environmental impact statements, using the execution date of the Standard Contract as the starting point, if applicable. Include a project approval assessment which describes, in narrative form, each segment of the process, the required permit or approval, and the basis for projection of success by the milestone date. All requirements should be included on the project schedule in Section 11.
- 8.3. Provide a preliminary environmental assessment of the site and project, including both construction and operation. The Applicant should identify environmental impacts associated with the proposed project, any potential impediments to development, and its plan to mitigate such impacts or impediments. The analysis should address each of the major environmental areas presented below:
 - Site development
 - Transportation infrastructure
 - Air quality
 - Water resources/water quality
 - Ecology
 - Land use
 - Cultural resources
 - Previous site use
 - Noise level
 - Aesthetic/visual
 - Transmission and distribution infrastructure
 - Fuel supply access (if applicable)

- 8.4. Provide documentation identifying the level of public support for the project including letters from public officials, newspaper articles, etc. If the project sponsor has not yet initiated community outreach for the project, please describe any plans for such outreach activities.

9. Engineering and Technology; Commercial Access to Equipment

This section includes questions pertinent to the engineering design and project technology. Applicants should provide information about the specific technology or equipment including the track record of the technology and equipment.

- 9.1. Provide a reasonable but preliminary engineering plan which includes the following information:
 - Type of generation technology
 - If wind turbines, provide the turbine make and model, hub height, rotor diameter, and power curve
 - Major equipment to be used
 - Manufacturer of the equipment
 - Status of acquisition of the equipment
 - Whether the Applicant has a contract for the equipment. If not, describe the Applicant's plan for securing equipment and the status of any pertinent commercial arrangements
 - Equipment vendors selected/considered
 - History of equipment operations
 - If the equipment manufacturer has not yet been selected, identify in the equipment procurement strategy the factors under consideration for selecting the preferred equipment
- 9.2. If the Applicant has not yet selected the major generation equipment for the project, please provide a list of the key equipment suppliers under consideration.
- 9.3. Please identify the same or similar equipment by the same manufacturer that are presently in commercial operations including the number installed and installed capacity
- 9.4. For less mature technologies provide evidence (including identifying specific applications) that the technology to be employed for energy production is ready for transfer to the design and construction phases. Also, address how the status of the technology is being considered in the financial plan for the project.

10. Operation and Maintenance

Projects that can demonstrate that the maintenance plan, level of funding, and mechanism for funding will ensure reliable operations during the term of the contract are preferred.

- 10.1. Provide an operation and maintenance plan for the project that demonstrates the long term operational viability of the proposed project. The plan should include a discussion of the staffing levels proposed for the project, the expected role of the project sponsor or outside contractor, scheduling of major maintenance activity, and the plan for testing equipment.
- 10.2. Describe in detail the proposed O&M funding mechanism and funding levels to support planned and unplanned O&M requirements.
- 10.3. Describe the terms (or expected terms) of the warranties and/or guarantees on major equipment that the Applicant is seeking.
- 10.4. Describe the status of the project sponsor in securing any operation and maintenance agreements or contracts. Include a discussion of the sponsors plan for securing a medium-term or long-term O&M contract, including the expected provider of O&M services.
- 10.5. Provide examples of the Applicant's experience with O&M services for other similar projects.

11. Project Schedule

Applicants are required to provide a complete critical path schedule for the project from the notice of selection of the project for contract consideration to the start of commercial operations. For each project element, list the start and end date.

Identify the elements on the critical path. The schedule should include, as a minimum, facility contracts, start of construction, construction schedule, siting, fuel supply (if applicable), financing, engineering and procurement, acquisition of real property rights, Federal, state and/or local permits, licenses, environmental assessments and/or environmental impact statements (including anticipated permit submittal and approval dates) and any other requirements that could influence the project schedule, and the Commercial Operation Date.

12. Project Management/Experience

Applicants are required to demonstrate project experience and management capability to successfully develop and operate the project proposed. The Distribution Companies are particularly interested in project teams that have demonstrated success in projects of similar type, size and technology and can demonstrate an ability to work together effectively to bring the project to commercial operation in a timely fashion.

- 12.1. Provide an organizational chart for the project that lists the project participants and identifies the corporate structure, including general and limited partners.
- 12.2. For each of the project participants (including the Applicant, partners, A/E firm, EPC contractor and proposed contractors), provide statements that list the specific experience of the firm in developing, financing, owning, and operating generating facilities, other projects of similar type, size and technology, and any evidence that the project participants have worked jointly on other projects.
- 12.3. Provide a management chart that lists the key personnel dedicated to this project and provide biographies of the key personnel.
- 12.4. Provide a listing of all projects (up to the most recent 10 projects, if applicable) the project sponsor has successfully developed or that are currently under construction. Provide the following information as part of the response:
 - Name of the project
 - Location of the project
 - Project type, size and technology
 - Commercial operation date
 - Estimated and actual capacity factor of the unit for the past three years
 - Availability factor of the unit for the past three years
 - References, including the names and current addresses and telephone numbers of individuals to contact for each reference.
- 12.5. With regard to the Applicant's project team, identify and describe the entity responsible for the following:
 - Construction Period Lender, if any
 - Operating Period Lender and/or Tax Equity Provider, as applicable
 - Financial Advisor
 - Environmental Consultant

- Owner's Engineer
- EPC Contractor (if selected)
- Transmission Consultant
- Legal Counsel

13. Direct Economic Benefits to Rhode Island

Total construction cost

\$ _____

Estimated expenditures with local contractors?

\$ _____

Construction jobs created⁵

Number _____ Duration _____

How many jobs will be created in Rhode Island to support operation?

_____ Direct Jobs

_____ Indirect Jobs

Estimate of the annual property taxes or other similar revenues?

\$ _____

⁵ All job estimates should be expressed as full-time (annual) equivalents.

CLEAN VERSION

Rhode Island Renewable Distributed Generation Standard Contract Enrollment Application and Enrollment Process Rules

Rhode Island Renewable Distributed Generation Standard Contract Enrollment Application and Enrollment Process Rules

I. Introduction and Overview

1.1 Purpose of the Enrollment

The Narragansett Electric Company d/b/a National Grid (“National Grid”) or the “Company”), is seeking applications to enter into standard contracts for the supply of electric capacity and energy and Renewable Energy Certificates and related attributes (including Certificates issued in the New England Power Pool Generation Information System) (collectively, “RECs”) from eligible Distributed Generation projects pursuant to Chapter 26.2 of Title 39 of the Rhode Island General Laws, entitled Distributed Generation Standard Contracts Act (the “Act”), which became effective June 29, 2011, and solicitation and enrollment process rules promulgated thereunder. In addition, National Grid is conducting this enrollment in accordance with the Rules and Regulations Governing Long-Term Contracting Standards for Renewable Energy (the “Regulations”) promulgated under Chapter 26.1 by the Rhode Island Public Utilities Commission (“Commission”), which became effective January 28, 2010.¹ In the enrollment period for the current program year, National Grid is soliciting capacity, energy, RECs and all other environmental attributes and market products that are available or may become available from Distributed Generation facilities pursuant to standard contracts for fifteen (15) year terms.

1.2 Statutory Framework

Pursuant to the provisions of the Act, National Grid is required to procure 10% of the minimum long-term contract capacity under the long-term contracting standard for renewable energy in section 39-26.1-2, or 9 MW, based on annual class targets set by the Board² and approved by the Rhode Island Public Utilities Commission (“Commission”). National Grid shall enter standard contracts for an aggregate nameplate capacity of at least 40 MW of Distributed Generation projects by the end of 2014, as set forth in the following four (4) year schedule:

By December 31, 2011: a minimum of five megawatts (5 MW) nameplate capacity

By December 31, 2012: a minimum aggregate of twenty megawatts (20 MW)
nameplate capacity

By December 31, 2013: a minimum aggregate of thirty megawatts (30 MW) nameplate
capacity

¹ Except as expressly differentiated in the Act, the standard contracts entered into shall be treated for all purposes as long-term contracts entered into under the provisions of the long-term contracting standards for renewable energy found in chapter 26.1 of Title 39 of the Rhode Island General Laws, and all such provisions shall apply to such contracts. R.I.G.L. §39-26.2-9.

² The Distributed Generation Standard Contract Board, or if not yet constituted, the Rhode Island Office of Energy Resources.

By December 31, 2013: a minimum aggregate of forty megawatts (40 MW) nameplate capacity

Thus, under a single enrollment in 2011, the initial program year, National Grid must enter standard contracts for a minimum of 5 MW nameplate capacity. Thereafter, the Company must conduct three enrollments annually. Each enrollment will be open for a two-week period. National Grid is not required to enter into more than one-third of the annual target per enrollment, with the exception of the 2011 program year. The attached Schedule 1 sets out a schedule of anticipated dates for the 2011 Enrollment process. The classes and annual targets for the 2011 program year are listed in Schedule 2 of this application.

1.2.1 Applications

Applicants are required to complete and submit a short-form application (“Application”) which Application shall require the applicant to provide the project owner’s identity and the project’s proposed location, nameplate capacity, and renewable energy class and, as described in Section II below, allows for additional information including information relative to the permitting, financial feasibility, ability to build, and timing for deployment of the proposed projects. For large distributed generation projects the Application also requires the applicant to bid a fixed bundled price for the sale of the energy, capacity, renewable energy certificates, and all other environmental attributes and market products that are available or may become available from the distributed generation facility on a fixed per kilowatt-hour basis for the output of the project. The Application to be used by applicants in this enrollment is attached as Attachment A.

Successful applicants will be selected in accordance with the process set forth in this application, which encompasses the solicitation and enrollment process rules. Standard contracts will be finalized between National Grid and successful applicants, based on the ceiling prices and annual targets for each renewable energy technology class set by the Board and approved by the Commission. A blank Standard Contract, which has been approved by the Commission, is included in this application as Appendix B. Applicants are responsible for reading and understanding the Standard Contract to the extent necessary to submit an application, and to promptly execute this contract if selected in the enrollment. There will be no exceptions to the Standard Contract.

1.2.2 Eligibility Requirements

To be eligible under this enrollment, a distributed generation facility must be a “newly developed renewable energy resource” under the Long-Term Contracting Standard and the Regulations. A “newly developed renewable resource” is defined as an electric generation unit that uses exclusively an eligible renewable energy resource (as defined under R.I.G.L. § 39-26-5 and Section 5 of the Rules and Regulations governing the Implementation of a Renewable Energy Standard, effective July 25, 2007), that has neither begun operation, nor have the developers completed financing

for construction.³ The eligible technologies include biogas generated as a result of anaerobic digestion, but specifically exclude all other listed biomass fuels. Further, the unit must be located in the Narragansett Electric Company ISO-NE load zone, with a nameplate capacity no greater than five (5) MW, and be connected to the electric distribution company's power system.

a. Small Distributed Generation Projects

National Grid shall enter into standard contracts for fifteen (15) year terms at the applicable Ceiling Price with Small Distributed Generation projects on a first-come first-serve basis, provided the applicants meet the minimum threshold requirements set forth in this application and enrollment process rules. If there are more small projects than what is specified for a class target, National Grid shall review the applications submitted, and select first those projects that appear to be the furthest along in development and most likely to be deployed utilizing a competitive non-price scoring method described later. Small Distributed Generation Projects must have a nameplate capacity no larger than the following: Solar: 500 kW; Wind: 1.5 MW; and Other Technologies: 1 MW. The applicant must submit an affidavit confirming that the project is not a segment of a larger project.

b. Large Distributed Generation Projects

Large Distributed Generation projects must bid a fixed bundled price for the sale of energy, capacity, and renewable energy certificates ("RECs") and all other environmental attributes and market products that are available or may become available from the distributed generation facility on a per kilowatt-hour basis for the output of the project for a contract term of fifteen (15) years. Alternative Pricing is allowed for a contract term different than fifteen (15) years, but the Applicant must demonstrate why the alternative term is appropriate, and if the Company agrees to the different term it must be approved by the Commission. Selection will be based on the lowest price received and on competitive non-price scoring, but not to exceed the applicable ceiling price, provided the applicants meet the minimum threshold requirements set forth in this application. Large Distributed Generation Projects are larger than the Small Distributed Generation Project sizes set forth above, but are no greater than 5 MW.

II. Bid Evaluation and Selection Criteria and Process

2.1 Overview of Bid Evaluation and Selection Process

Applications received by National Grid, will be subject to a consistent and defined review, evaluation and selection process. All projects will be evaluated only against other projects submitted in the same approved class for that current enrollment. The first stage consists of a review of whether the bids satisfy specified eligibility and

³ Under Section 3.16 of the Regulations, projects located within the State of Rhode Island which obtained financing on or after January 1, 2009, which have not begun operation, would also be considered a "newly developed renewable energy resource."

minimum threshold requirements. National Grid will conduct any additional evaluation as required, consistent with the requirements set forth above, and select applicants for execution of Standard Contracts. Consultation with the Rhode Island Office of Energy Resources and/or the Rhode Island Division of Public Utilities and Carriers may also be utilized in this further assessment. Applicants selected by National Grid will be required to indicate in writing whether they intend to proceed with their proposals within five business days of being notified, and to execute contracts within two business days thereafter. All executed contracts will be filed with the Commission.

2.2 Interconnection Progress Prior to Enrollment

The Act requires that the distributed generation facility owner be liable for the cost of interconnection, and sufficient progress in the interconnection process must be made prior to the enrollment. Project owners must have submitted an Interconnection application and have a completed Feasibility study as defined in the Rhode Island Distributed Generation Interconnection Act and The Narragansett Electric Company Standards for Connecting Distributed Generation, and must provide copies with this application for enrollment. If the project has a completed Impact study, this would also be acceptable, since it is a more comprehensive study.

Information regarding Interconnection of Generators in Rhode Island can be found at the following link:

https://www.nationalgridus.com/narragansett/business/energyeff/4_interconnect.asp

2.3 Minimum Threshold Requirements

The Distributed Generation Standard Contracts Act requires that Standard Contracts include a requirement that distributed generation facility owners make a performance guarantee deposit to National Grid. Should the distributed generation facility not produce the output proposed in its enrollment application within eighteen (18) months of contract execution, the contract is automatically voided, and the performance guarantee deposit is forfeited. It is a threshold requirement, therefore, that the construction schedule for a project lead to accomplishment of this critical milestone within eighteen months of contract execution.⁴

As a second threshold requirement, project developers submitting applications must have also submitted applications for interconnection and received a Feasibility study, or an Impact study, which should be submitted as part of the application.

⁴ The performance guarantee deposit is fifteen dollars (\$15.00) for small distributed generation projects and twenty-five dollars (\$25.00) for large distributed generation projects for every renewable energy certificate (REC) estimated to be generated per year under the contract, but at least five hundred dollars (\$500) and not more than seventy-five thousand dollars (\$75,000), paid at the time of contract execution. Should this milestone be achieved, the deposit shall be refunded, without interest, on a prorated basis of renewable energy actually delivered over the course of the first year of the project's operation.

Applications that meet all the eligibility requirements and the above minimum threshold requirements will be further evaluated to determine compliance with a broader set of requirements, which have been designed to screen out proposals that are insufficiently mature from a project development perspective; lack technical viability; or fail to satisfy minimum standards for bidder experience and ability to finance the proposed project. The categories of information necessary to complete this further evaluation are set forth below.

- Energy Resource Plan
- Financial/Legal Capability
- Site Control
- Permit Acquisition Plan
- Interconnection
- Technical/Engineering
- Project Schedule
- Project Management and Experience
- Economic Benefit to Rhode Island

National Grid is interested in projects that can demonstrate the ability to develop, permit, finance, and construct the proposed project within the required eighteen month schedule.

Applicants must use this application to provide responses. Applicants are requested to provide all reasonably available information in each section of the application. If any of the information requested is inconsistent with the type of technology or product proposed, the Applicant should include "N/A" and describe the basis for this designation. It is anticipated that larger projects may provide a higher level of detail in the responses than smaller projects. It is emphasized however, that Applicants who do not provide complete and credible information in any of the above categories will be scored accordingly in the Scoring Process. The forms are included in this Application in MS Word format as Appendix A.

2.4 Project Scoring

In conducting evaluations of each project, National Grid will employ the scoring methodology described in Schedule 3. The non-price evaluation criteria are designed to assess the likelihood of a project coming to fruition based on various factors critical to successful project development. The objectives of the criteria are to provide an indication of the feasibility and viability of each project and the likelihood of meeting the proposed commercial operation date. Applications that can demonstrate, based on the current status of project development and past experience, that the project will likely be successfully developed and operated as proposed will have a higher likelihood of success.

For Small Distributed Generation projects, National Grid plans to weight completion schedule at fifty percent (50%) and non-price factors at fifty percent (50%). For Large Distributed Generation projects, price is weighted at eighty percent (80%) and non-price factors at twenty percent (20%).

National Grid reserves the right to reject any project not receiving a minimum score in the non-price evaluation, regardless of the completion date or pricing.

If the situation arises where multiple projects share the same interconnection facilities, and in the event that such projects receive equivalent scores in the evaluation, the project with the earliest interconnection application will be taken first. In addition, National Grid will reject any application for which interconnection is not technically feasible.

2.5 Projects at Customer Sites Involving Net Metering

A distributed generation project that is also being employed by a customer for net metering purposes may submit an application to sell the excess output from the project.⁵ In this case, the applicant must be the project owner. The class in which the project is submitted is determined by the total project size, and not by the excess output offered for sale under a Standard Contract. The application forms in Appendix A require that both the project size and the excess output being offered for sale be specified.

2.6 Coordination with Annual Solicitations under the Long-Term Contracting Standard

The DG Enrollment process is separate and distinct from the annual competitive solicitations conducted under the Long-Term Contracting Standards. National Grid will provide reports to the Commission on both the solicitation and the annual enrollment process in order to track compliance with the Long-Term Contracting Standard. Projects submitted, but not yet selected, in an annual solicitation under the Long-Term Contracting Standards, may be submitted in a Distributed Generation enrollment. In this case, should the submitted pricing in one of the large DG classes be higher than that submitted in the competitive solicitation, a fully documented explanation must be provided. Additionally, the Applicant agrees that entering into a DG Standard Contract will automatically rescind the Applicant's bid relative to that project in the annual solicitation under the Long-Term Contracting Standards.

2.7 Delivery of Energy into ISO-NE Market

Energy will be delivered to National Grid in the Narragansett Electric Company ISO-NE load zone at the delivery node associated with the distributed generator. This will be accomplished through registration of the generator as a generation asset and assignment of the energy to National Grid.

2.8 Participation in ISO-NE Forward Capacity Market (FCM)

⁵ In such case, at the election of the self-generator all of the renewable energy certificates pertaining to the energy consumed on site may be sold on a month-to-month basis outside of the terms of the standard contract.

National Grid shall be the "Project Sponsor" for all Large Distributed Generation Facilities and may qualify the Facility as an Existing Capacity Resource in the Forward Capacity Market (FCM) after the Commercial Operation Date and participate in every Capacity Commitment Period in the FCM with respect to the Facility. National Grid also reserves the right to be the "Project Sponsor" for Small DG Facilities, after consultation with the Division and the Board. If and when National Grid participates as "Project Sponsor" on behalf of any Facility, that Facility must support National Grid, as required, to qualify the Facility as an Existing Capacity Resource in the Forward Capacity Market. Generation owners are required to take commercially reasonable actions to maximize performance against any FCM Capacity Supply Obligations.

2.9 RPS Qualification and NEPOOL Generation Information System ("GIS") Certificates

The Distributed Generation projects must obtain qualification as a renewable resource per the Rhode Island Renewable Energy Standard ("RES"), and it must register as a Participant Account Holder with the NEPOOL-GIS. Once qualified, National Grid must be designated to receive all of the RECs produced by the project and tracked in the NEPOOL-GIS⁶ under the operating rules found at http://www.iso-ne.com/committees/comm_wkgrps/mrks_comm/geninfo_sys/operating/index.html

2.10 Official Contact for the Enrollment

Any questions on the Enrollment should be directed to the attention of the Official Contact for National Grid at the address listed below:

Corinne Abrams
Manager, Environmental Transactions
Energy Procurement
National Grid
100 East Old Country Road
Hicksville, NY 11801
(516) 545-5435

Questions may be submitted to the Official Contact at following email address:
corinne.abrams@us.ngrid.com

2.11 Submittal of Enrollment Applications

The Standard Contract Enrollment Application and Appendices are posted on the National Grid energy supply procurement website.

⁶ The Rhode Island Distributed Generation Standard Contract Act requires that an electric meter which conforms with standard industry norms be installed to measure the electrical energy output of the distributed generation facility, and require a system or procedure by which the distributed generation facility owner shall demonstrate creation of renewable energy credits, in a manner recognized and accounted for by the GIS; such demonstration of renewable energy credit creation to be at the distributed generation facility owner's expense.

http://www.nationalgridus.com/energysupply/current_procurement.asp.

Completed applications should be submitted electronically following the instructions on the site for the Rhode Island Standard Contract Enrollment for renewable energy. Electronic submittal will assure that the time of submittal is documented.

Schedule 1

Event	Anticipated Dates
Enrollment begins	December 1, 2011
Due Date for Submission of Applications	December 14, 2011 5PM EPT
Execute Contracts	December 30, 2011
File Contracts with PUC	January 6, 2012

Note: Schedule 1 to be updated as required for each enrollment period.

Schedule 2
Classes and Targets Applicable to Current Enrollment Period

Class	Target (kW)	Ceiling Price
Small Solar (< 500 kW)		
Large Solar (>500 kW; < 5 MW)		
Small Wind (<1.5 MW)		
Large Wind >1.5 MW; <5 MW		
Other Technologies (Small) <1.0 MW		
Other Technologies (Large) >1.0 MW; <5 MW		

Note: Schedule 2 to be updated as required for each enrollment period.

Schedule 3 Project Evaluation and Scoring Methodology

Non-Price Scoring for All Projects (20 points)

Non-price scoring is the same methodology employed National Grid in the initial competitive solicitation, and documented in the report on that solicitation, filed with the RI PUC on April 11, 2011. The scoring methodology is summarized as follows, and is based on the responses in Appendix A.

Evaluation Factors	Max Points	Criteria Considered in Each Factor
A. Siting and Permitting	4.0	<ul style="list-style-type: none"> • Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways (1.5 points) • Identification of required permits and approvals and status of plan to obtain permits and approvals (1.5 points) • Community relations/support (1.0 points)
B. Project Development Status and Operational Viability	6.0	<ul style="list-style-type: none"> • Reasonableness of critical path schedule and demonstrated ability to meet major milestones (1.5 points) • Credibility of energy resource plan (1.5 points) • Commercial access to and reliability of the proposed technology (1.0 points) • Progress in interconnection process (2.0 points)
C. Experience and Capability of Bidder and Project Team	3.0	<ul style="list-style-type: none"> • Project development experience (1.0 points) • Project financing experience (1.0 points) • Operations and maintenance experience (1.0 points)
D. Financing	4.0	<ul style="list-style-type: none"> • Credibility of the financing plan (2.0 points) • Financial strength of the bidder (2.0 points)
E. Economic Benefit	3.0	<ul style="list-style-type: none"> • Project provides direct employment benefits (1.0 points) • Project provides indirect employment benefits (1.0 points) • Project provides tax revenues or other similar revenues (1.0 points)
Total	20.0	

Score on Completion Date for Small Projects (20 points)

For each class, the project with the nearest completion date (commercial operation) will receive 20 points. Other projects will receive a deduction of two points per month of additional schedule duration.

Score on Submitted Price for Large Projects (80 points)

For each class, the project with the lowest price relative to the ceiling price will receive 80 points. For other projects, one point will be deducted for each \$MWh higher than the lowest submitted price.

Total Scoring

Small Projects	
Non-Price Scoring	20
Score on Completion Date	20
Total	40
Large Projects	
Price Scoring	80
Non-Price Scoring	20
Total	100

For small projects, the scoring methodology is intended to discriminate between a project with a near-term completion date, and a “credible” project with a near-term completion date, that is most likely to be deployed.

For large projects, the scoring methodology is intended to discriminate between a project with competitive pricing, and a “credible” project with competitive pricing, that is most likely to be successfully deployed.

National Grid reserves the right to reject any project not receiving a minimum score in the non-price evaluation, regardless of the completion date or pricing.⁷

⁷ There is the possibility that projects might meet (or even exceed) the threshold requirements, yet not make a credible demonstration that the project is likely to be completed and operated as proposed. It is not feasible to establish such a score in advance, as non-price scoring as a general matter is often driven by how projects compare on a relative basis. It would be expected, however, that some projects may clearly rank well below others in the same, or similar classes.

CLEAN VERSION

Rhode Island Renewable Distributed Generation Standard Contract Enrollment Application Appendix A

Rhode Island Renewable Distributed Generation Standard Contract Enrollment Application Appendix A

1. Authorized Representative's Signature Certification Form

The undersigned is a duly authorized representative of the Project listed below. The Representative hereby certifies that all the statements and representations made in this Application are true and accurate to the best of the Applicant's knowledge. The Applicant represents that it understands the requirements, terms and conditions of the Standard Contract. The Applicant certifies under the pains and penalties of perjury that the project submitted is not a segment of a larger newly developed project, which would not otherwise fall under the provisions of this Application.

Submitted by: _____
(Exact Legal Entity)

Project Owner: _____
(If different than above)

Signature of Authorized
Representative: _____

Title: _____

Date Signed: _____

2. Project Summary/Contact Information

Note: unless otherwise noted, all electric capacity and energy figures provided should be AC

Applicant Name: _____

Project Name: _____

Project Class:
(See Schedule 2) _____

Enrollment Period: _____

Estimated Commercial
Operation Date: _____

Project Site/Location
City or Town: _____

Proposed Interconnection Point: _____

Date of Interconnection
Application: _____

Proposed Point of Delivery: _____

Project Contact
Name: _____

Address: _____

Phone Number: _____

Email Address: _____

Facsimile Number: _____

Total capacity of the Project
(MW):

Gross: _____
Nameplate DC Rating (if solar) _____
:
Net _____

Contract Maximum Amount available for Delivery to National Grid (at the Point of Delivery (kWh AC per hour)¹:

Expected Annual Energy Production to be delivered to National Grid at the Point of Delivery (MWh AC):

Estimated Net Capacity Factor (%):

Study Provided to Support Estimated Generation:

_____(Yes) _____(No)

If Yes, Name of Firm Who Prepared the Study:

Expected Annual Availability (%):

Term of Contract:

Estimated Equipment Life:

Equipment Manufacturer:

Interconnection Application No.:

Project Type:
(Check as applicable)

_____ Non-Firm Intermittent Energy

_____ Baseload Energy

¹ If net metering, distinguish between total project generation and deliveries to the electric distribution system.

3. Pricing Information (Applicable to Large Projects only)

This section is applicable only to Large Projects. Pricing must be submitted as a fixed bundled price for the sale of energy, capacity, and renewable energy certificates (RECs) on a per kilowatt-hour (\$/kWh) basis for the output of the project over the contract term of fifteen (15) years.

Price² (\$/kWh): _____(to five decimal places)

Alternative Pricing is allowed for a contract term different than fifteen (15) years, but the Applicant must demonstrate why the alternative term is appropriate.

Alternative Contract Term (years): _____

Alternative Price (\$/kWh): _____

²Projects submitted, but not yet selected, in an annual solicitation under the Long-Term Contracting Standards, may be submitted in a Distributed Generation enrollment. In this case, should the submitted pricing in one of the large DG classes be higher than that submitted in the competitive solicitation, a fully documented explanation must be provided here in Section 3. Additionally, the Applicant agrees that entering into a DG Standard Contract will automatically rescind the Applicant's bid relative to that project in the annual solicitation under the Long-Term Contracting Standards.

4. Operational Parameters

Note: all electric capacity and energy figures provided should be AC

Applicants should provide the following information requested regarding the project operational parameters and general project information. If information requested is not applicable to the specific technology, the Applicant should specify with an N/A.

4.1. Operating Characteristics

4.1.1. Nameplate Capacity: _____ MW

Net Capacity at Average Site conditions: _____ MW

4.1.2. Expected Capacity to be Qualified in the ISO-NE Forward Capacity Market³

Winter: _____ MW

Summer: _____ MW

4.1.3. Energy Generation

Expected Gross Annual Energy Production: _____ MW/yr

Expected Net Annual Energy Production: _____ MW/yr

Expected Peak and Off-Peak Monthly Production⁴

Month	On-Peak (MWh/Month)	Off-Peak (MWh/Month)
January		
February		
March		
April		
May		
June		
July		
August		

³ Expected capacity to be qualified in each capability period using the specific conventions applicable to the project type, i.e. conventional or intermittent generator. Please see the following ISO-NE rules, procedures and manuals for a more complete description: OP-14 Technical Requirements for Generators, Demand Resources, and Asset Related Demands; M-RPA Registration and Performance Auditing; M-20 Forward Capacity Market; M-11 Market Operation; and OP-18 Metering and Telemetry Criteria. The overall market tariff is Market Rule 1.

⁴ If the level of generation is expected to vary over the life of the Standard Contract, the Applicant should provide an expanded table for the term of the Standard Contract.

September		
October		
November		
December		
Total		

4.1.4. Annual Degradation Rate (if any) and basis for it: _____

4.1.5. Expected Operating Life of the Project (years): _____

4.2. Operating Mode

Proposed method/mode of Operation

Intermittent Only
(Please define parameters of operation) _____

Must Run (at full load) _____

4.3. Maintenance Outage Requirements

Specify partial and complete planned outage requirements in weeks or days. Also, list the number of months required for the cycle to repeat (e.g., list time interval of minor and major overhauls, and the duration of overhauls.

5. Energy Resource Plan

The Applicant is required to provide an energy resource or fuel supply plan for its proposed project, including supporting documentation. The fuel supply/energy resource profile information should be consistent with the type of technology/resource option proposed and the term of the Standard Contract proposed. The information requested is organized according to the type of project or energy resource. Applicants should respond only to relevant questions.

The Energy Resource Plan should provide a reliable basis for translation of nameplate capacity to contract capacity under the Long-Term Contracting Standard.

Wind Energy Projects:

- Provide a summary of all collected wind data for the proposed site. Identify when the data was collected and by whom.
- Indicate where the data was collected and its proximity to the proposed site. Include an identification of the location for the anemometers and/or other wind speed measurement devices that were used to arrive at an assessment of the site generation capability.
- Provide (a) at least one year of hourly wind resource data, or (b) a wind resource assessment report from a qualified resource assessment firm or meteorologist, or (c) both. Include an analysis of the available wind data which addresses the relationship between wind conditions and electrical output.
- Provide a projection of gross and net annual energy production, including projections of average net hourly energy production, based on the wind resource data (a 12 x 24 energy projection).
- Please provide an explanation if the average of the hourly MWh of production is different from the expected Net Annual Energy Production.
- Provide a site-adjusted power curve. Each curve should list the elevation, temperature and air density used.
- Identify the assumptions for losses in the calculation of projected annual energy production, including each element in the calculation of losses.

Biomass (limited to Anaerobic Digestion Biogas):

- Provide a resource assessment of available biomass fuel for the proposed project and its proximity to the project site.
- Provide a plan for obtaining the biomass fuel or feedstock, including a transportation plan.
- Provide any contracts or letters of intent to acquire and transport the biomass fuel or feedstock.

- Demonstrate that projected energy output for the project over the term of the contract is consistent with the energy supply available.
- Describe any contingencies or constraints that could affect the availability of fuel or the energy resource for the project and any contingency plans for meeting projected generation levels

Solar:

- Provide an assessment of the available solar incidence or resource and the projected production profile for the project. Identify anticipated generation by hour and month for at least a one-year period and describe any trends in generation capability over time (i.e. annual decline rate of expected output).
- Describe the methodology used to generate the projected generation and describe the in-house or consulting expertise used to arrive at the generation estimates. Use of “PV Watts,” a solar PV generation estimation tool developed by the National Renewable Energy Laboratory (NREL) is acceptable, with sufficient explanation of chosen inputs to the calculator.

Hydro:

- Describe the project characteristics in terms of water flow (on a monthly basis) and head, and state the assumptions regarding seasonal variations, and a conversion of such flow into kilowatts and kilowatt-hours. Provide monthly flow duration curves based upon daily stream flow records.
- Identify if the project is run-of-river or has storage capability.
- If the project is an expansion of an existing project, (a) provide energy output estimates with and without the proposed expansion and (b) specify the quantity of energy that would qualify as RPS Class I Renewable Generation and the actions proposed to be taken by the Applicant to accomplish such qualification.

6. Financial/Legal

Applicants are required to provide responses to all questions below. Applicants are required to demonstrate the financial viability of their proposed project. Applicants should provide the following information:

- 6.1. Provide a description of the structure of the Applicant's organization from a financial and legal perspective, including any general and limited partners, officers, directors, managers, members and shareholders, involvement of any subsidiaries supporting the project, and the providers of equity and debt during project development. Provide an organization chart showing the relationship between the equity participants and an explanation of the relationships.
- 6.2. Provide a description of the financing plan for the project, including construction and term financing. The financing plan should address the following:
 - Who will finance the project and how it will be financed
 - The project's planned permanent financial structure
 - Expected sources of debt and equity financing
 - Estimated construction costs and arrangements for construction financing
 - Describe any agreements entered into with respect to equity ownership in the proposed project and any other financing arrangement.

In addition, the financing plan should address the financing of development costs. All Applicants are required to provide this information.

- 6.3. Provide documentation illustrating the experience of the project sponsor in securing financing for projects of similar size and technology. For each project (up to the 10 most recent, if applicable) previously financed provide the following information:
 - Project name and location
 - Project type and size
 - Date of construction and permanent financing
 - Form of debt and equity financing
- 6.4. Provide evidence that the Applicant has the financial resources and financial strength to complete and operate the project as planned.

- 6.5. The Applicant should demonstrate its ability (and/or the ability of its credit support provider) to provide the required security, including its plan for doing so.
- 6.6. Provide a description of any current credit issues regarding the Applicant or affiliate entities raised by rating agencies, banks, or accounting firms.
- 6.7. Describe the role of the federal Production Tax Credit or Investment Tax Credit (or other incentives) on the viability of the project.
- 6.8. Applicants must disclose any pending or threatened litigation related to projects owned or managed by them or any of their affiliates in the United States.

7. Siting and Interconnection

This section of the response package addresses project location, siting, real property rights and interconnection issues. Applicants should ensure that the threshold criteria for siting are verified in their responses.

- 7.1. Provide a site plan including a map of the site that clearly identifies the location of the property, the location of the generation facility on the site, the total acreage, the anticipated interconnection point, and the relationship of the site to other local infrastructure, including transmission facilities, roadways, and water sources. In addition to providing the required map, provide a site layout plan which illustrates the location of all major equipment and facilities on the site.
- 7.2. Provide evidence of the right to use the site.
- Does the project have a right to use the site (e.g., by virtue of ownership or land rights obtained from the owner)?
 - If so, please identify the means of site control.

Include any relevant documentation, e.g., lease agreement, option to lease, purchase agreement, option to purchase, or letter of intent regarding any of the foregoing.

- 7.3. Provide evidence that the project is consistent with the zoning of the site, and not subject to any other restrictions. If there are zoning or other restrictions, identify present and required zoning and/or land use designations, identify any restrictions, and provide a permitting plan and timeline to secure the necessary approvals.
- 7.4. Provide a description of the area surrounding the site including a description of the local zoning, flood plain information, existing land use and setting (woodlands, grasslands, agriculture, other).
- 7.5. Identify any real property rights (e.g., fee-owned parcels, rights-of-way or easements) that are required for access to the project or for interconnection. Describe the status of acquisition of real property rights, and describe the plan for securing the necessary real property rights, including the proposed timeline. Include these plans and the timeline in the overall project timeline.
- 7.6. Provide a copy of the interconnection application. Provide a copy of the Feasibility study and/or Impact study, as defined by the Rhode Island Distributed Generation Interconnection Act, completed to date. Provide a copy of an interconnection services agreement, if executed by the Applicant with respect to the proposed project.

- 7.7. Provide a copy of an electrical one-line diagram showing the interconnection facilities and the relevant transmission or distribution facilities.
- 7.8. Specify and describe the interconnection and transmission or distribution facilities that are required, including system control and protection.

8. Environmental Assessment and Permit Acquisition Plan

This section addresses environmental and other regulatory issues associated with project siting, development and operations.

- 8.1. Provide a list of all the permits, licenses, and environmental assessments and/or environmental impact statements required. If a Applicant has secured any permit or has applied for a permit, please identify in the response.
 - Provide a list of all Federal, state and local permits, licenses, and environmental assessments and/or environmental impact statements required to construct and operate the project.
 - Identify the governmental agencies which will issue or approve the required permits, licenses, and environmental assessments and/or environmental impact statements.
- 8.2. Provide the anticipated timeline for seeking and receiving the required permits, licenses, and environmental assessments and/or environmental impact statements, using the execution date of the Standard Contract as the starting point, if applicable. Include a project approval assessment which describes, in narrative form, each segment of the process, the required permit or approval, and the basis for projection of success by the milestone date. All requirements should be included on the project schedule in Section 11.
- 8.3. Provide a preliminary environmental assessment of the site and project, including both construction and operation. The Applicant should identify environmental impacts associated with the proposed project, any potential impediments to development, and its plan to mitigate such impacts or impediments. The analysis should address each of the major environmental areas presented below:
 - Site development
 - Transportation infrastructure
 - Air quality
 - Water resources/water quality
 - Ecology
 - Land use
 - Cultural resources
 - Previous site use
 - Noise level
 - Aesthetic/visual
 - Transmission and distribution infrastructure
 - Fuel supply access (if applicable)

- 8.4. Provide documentation identifying the level of public support for the project including letters from public officials, newspaper articles, etc. If the project sponsor has not yet initiated community outreach for the project, please describe any plans for such outreach activities.

9. Engineering and Technology; Commercial Access to Equipment

This section includes questions pertinent to the engineering design and project technology. Applicants should provide information about the specific technology or equipment including the track record of the technology and equipment.

- 9.1. Provide a reasonable but preliminary engineering plan which includes the following information:
 - Type of generation technology
 - If wind turbines, provide the turbine make and model, hub height, rotor diameter, and power curve
 - Major equipment to be used
 - Manufacturer of the equipment
 - Status of acquisition of the equipment
 - Whether the Applicant has a contract for the equipment. If not, describe the Applicant's plan for securing equipment and the status of any pertinent commercial arrangements
 - Equipment vendors selected/considered
 - History of equipment operations
 - If the equipment manufacturer has not yet been selected, identify in the equipment procurement strategy the factors under consideration for selecting the preferred equipment
- 9.2. If the Applicant has not yet selected the major generation equipment for the project, please provide a list of the key equipment suppliers under consideration.
- 9.3. Please identify the same or similar equipment by the same manufacturer that are presently in commercial operations including the number installed and installed capacity
- 9.4. For less mature technologies provide evidence (including identifying specific applications) that the technology to be employed for energy production is ready for transfer to the design and construction phases. Also, address how the status of the technology is being considered in the financial plan for the project.

10. Operation and Maintenance

Projects that can demonstrate that the maintenance plan, level of funding, and mechanism for funding will ensure reliable operations during the term of the contract are preferred.

- 10.1. Provide an operation and maintenance plan for the project that demonstrates the long term operational viability of the proposed project. The plan should include a discussion of the staffing levels proposed for the project, the expected role of the project sponsor or outside contractor, scheduling of major maintenance activity, and the plan for testing equipment.
- 10.2. Describe in detail the proposed O&M funding mechanism and funding levels to support planned and unplanned O&M requirements.
- 10.3. Describe the terms (or expected terms) of the warranties and/or guarantees on major equipment that the Applicant is seeking.
- 10.4. Describe the status of the project sponsor in securing any operation and maintenance agreements or contracts. Include a discussion of the sponsors plan for securing a medium-term or long-term O&M contract, including the expected provider of O&M services.
- 10.5. Provide examples of the Applicant's experience with O&M services for other similar projects.

11. Project Schedule

Applicants are required to provide a complete critical path schedule for the project from the notice of selection of the project for contract consideration to the start of commercial operations. For each project element, list the start and end date.

Identify the elements on the critical path. The schedule should include, as a minimum, facility contracts, start of construction, construction schedule, siting, fuel supply (if applicable), financing, engineering and procurement, acquisition of real property rights, Federal, state and/or local permits, licenses, environmental assessments and/or environmental impact statements (including anticipated permit submittal and approval dates) and any other requirements that could influence the project schedule, and the Commercial Operation Date.

12. Project Management/Experience

Applicants are required to demonstrate project experience and management capability to successfully develop and operate the project proposed. The Distribution Companies are particularly interested in project teams that have demonstrated success in projects of similar type, size and technology and can demonstrate an ability to work together effectively to bring the project to commercial operation in a timely fashion.

- 12.1. Provide an organizational chart for the project that lists the project participants and identifies the corporate structure, including general and limited partners.
- 12.2. For each of the project participants (including the Applicant, partners, A/E firm, EPC contractor and proposed contractors), provide statements that list the specific experience of the firm in developing, financing, owning, and operating generating facilities, other projects of similar type, size and technology, and any evidence that the project participants have worked jointly on other projects.
- 12.3. Provide a management chart that lists the key personnel dedicated to this project and provide biographies of the key personnel.
- 12.4. Provide a listing of all projects (up to the most recent 10 projects, if applicable) the project sponsor has successfully developed or that are currently under construction. Provide the following information as part of the response:
 - Name of the project
 - Location of the project
 - Project type, size and technology
 - Commercial operation date
 - Estimated and actual capacity factor of the unit for the past three years
 - Availability factor of the unit for the past three years
 - References, including the names and current addresses and telephone numbers of individuals to contact for each reference.
- 12.5. With regard to the Applicant's project team, identify and describe the entity responsible for the following:
 - Construction Period Lender, if any
 - Operating Period Lender and/or Tax Equity Provider, as applicable
 - Financial Advisor
 - Environmental Consultant

- Owner's Engineer
- EPC Contractor (if selected)
- Transmission Consultant
- Legal Counsel

13. Direct Economic Benefits to Rhode Island

Total construction cost

\$ _____

Estimated expenditures with local contractors?

\$ _____

Construction jobs created⁵

Number _____ Duration _____

How many jobs will be created in Rhode Island to support operation?

_____ Direct Jobs

_____ Indirect Jobs

Estimate of the annual property taxes or other similar revenues?

\$ _____

⁵ All job estimates should be expressed as full-time (annual) equivalents.

TABLE
Comment Replies

Comment Replies

	Topic	Comment	By	Response
1	Complexity	Sections 5 through 12 are used to collect information that will enable National Grid to assess the viability of the project and the applicant to meet the obligations that would eventually be described in a contract. The format and type of data requested is similar to that used by the Massachusetts utilities in their recent long-term renewable contract RFP process and provides a comprehensive set of data to enable an effective assessment of project success. However, that process was to be utilized for larger projects and projects certainly larger than small DG projects, as defined by the Act. As a result, not all sections may be applicable to smaller projects, which is a point that is mentioned on page 5 of the filed package. Though we have not recommended changes at the current time, the complexity of the application is something that should be monitored to see if it becomes a barrier to small DG projects and whether the application requirements need to be changed for projects of certain size.	Division	Projects will be evaluated and ranked only within classes, e.g. small solar. Thus projects in a given class will be compared only to other projects in that class and current enrollment. National Grid will use reasonable discretion when evaluating small DG projects; it would not be anticipated that Small DG projects would provide the level of detail expected in large renewable projects, however, some projects would be expected to demonstrate an advantage over others. The Act clearly envisions an evaluation process to make efficient use of the nameplate capacity allocated to each class, and to the 40 MW program as a whole. Large projects are to be selected based on the lowest price received. Further, as stated in Section 39-26.2-6 (d), " if there are more projects than what is specified for a class target at the same price, the electric distribution company shall review the applications submitted and select first those projects that appear to the furthest along in development and likely to be deployed." These directives in the statute are the reasons for the project scoring.

Comment Replies

	Topic	Comment	By	Response
2	Complexity	The proposed enrollment process is much more complicated and burdensome than what was envisioned by the statute. The statute requires a performance deposit designed to discourage applicants from applying for contracts upon which they cannot deliver. That deposit makes most of the project screening criteria National Grid proposes to administer as part of enrollment unnecessary, especially since it is precisely this kind of administrative burdens that are very likely to discourage the kind of projects the statute was designed to encourage.	Washington County Regional Planning Council, PPL	The Act specifically requires that the enrollment application allow for "additional information relative to the permitting, financial feasibility, ability to build, and timing of deployment of the proposed projects." Also see above response. Section 39-26.2-6 (a).
3	Complexity	Appendix A - Overly burdensome for small projects. The following sections should be revised and reduced in scope: Section 6 - Financial/Legal, Section 7 - Siting and Interconnection, Section 8 - Environmental Assessment and Permit Acquisition Plan, Section 9 - Engineering and Technology; Commercial Access to Equipment, Section 10 - Operations and Maintenance.	RI Renewable Energy Fund	See above response. National Grid requires this information in order to complete the scoring process, and to screen out projects that are not sufficiently mature from a project development perspective, lack technical viability or do not demonstrate ability to obtain financing.

Comment Replies

	Topic	Comment	By	Response
4	Gathering of Data for Future Ceiling Price Calculations	<p>In a parallel proceeding, the statute directed the Rhode Island Office of Energy Resources (“OER”) to embark upon a process to determine ceiling prices for certain DG technologies. OER retained consultants to develop the ceiling prices from available data sources regarding capital costs, interconnection costs, O&M costs, debt interest rates, financial capitalization structure, and loan terms. Whenever a DG project receives a contract from National Grid, that project should be required to provide such data at the completion of the project. The compilation of such data could be used to enhance the ability to develop ceiling prices in the future. We do not suggest changing the contract rate, which would be determined according to ceiling prices in effect at the time of the application. These prices should be set for the term of the agreement. Rather, the gathering of data during each year’s application process could be used to periodically revise future ceiling price determinations that would be applicable to future application processes.</p>	Division	<p>National Grid supports the collection of data in order to develop ceiling prices for future program years. Such data should be collected and evaluated by the Board, which is responsible for developing these ceiling prices.</p>

Comment Replies

	Topic	Comment	By	Response
5	Economic Benefits	Though one of the Act's purposes is to "stimulate economic development," there is no explicit requirement that direct economic benefits be quantified as part of the application process. Section 13 of the application, which does require such quantification, may be too onerous for smaller projects and should not be required for small DG project applications. Also, it may be better to conduct an economic analysis for the entire project pool ex post rather than collect estimates (likely based on differing assumptions and methodologies) from each applicant.	Division	Section 39-26.2-9 of The Distributed Generation Standard Contracts Act states that "standard contracts entered into pursuant to this chapter shall be treated for all purposes as long-term contracts entered into under the provisions of the long-term contracting standards for renewable energy found in chapter 26.1 of title 39 of the general laws, and all such provisions shall apply to such contracts". That statute requires "all approved projects, regardless of their location, shall provide other direct economic benefits to the State of Rhode Island, such as job creation, increased property tax revenues or other similar revenues deemed substantial by the commission." When developing the Enrollment Application, National Grid concluded that as a minimum there should be some documentation of economic benefit, and recognition of this benefit in non-price scoring. The alternative would be to presume that all DG projects have an economic benefit, require no documentation, and drop this component of the scoring, assigning the three points in this category to other categories.

Comment Replies

	Topic	Comment	By	Response
6	Economic Benefits	Economic benefit is assumed in the purpose of the statute and is not required as a project evaluation criterion.	Washington County Regional Planning Council	See above response to #5.
7	Economic Benefits	Remove the requirement to prove projects are good for "economic development for RI". Not only is this not in the statute, and irrelevant, but muddies some of the purposes of the program, such as to "stimulate" economic development generically, and separately, to facilitate distributed generation to improve the local load zone distribution system's resilience, costs, etc. These criteria were not intended as requirements for each project but as purposes of the program in general.	PPL	See above response to #5.

Comment Replies

	Topic	Comment	By	Response
8	Economic Benefits	Does not appear to provide a means to evaluate a project based on scale. Under this review, a small project will have to directly compete with much larger projects. This will automatically result in higher rankings for larger projects, simply due to size, and not necessarily their respective economic development benefits. This section needs to be revised in order to accommodate a review of projects on their respective sizes/scale.	RI Renewable Energy Fund	Projects will be evaluated and ranked only within classes, e.g. small solar, large solar, wind. Thus, projects in a given class will be compared only to other projects in that class and current enrollment. The application will be revised to make this clear. National Grid believes that this information should be provided, so that a score can be assigned, but that alternative approaches to scoring could be considered. One alternative would be to omit the scoring, and spread the three points into other evaluation categories. Another alternative would be to score large projects (on a relative basis) using the submitted information, and award the points to small projects automatically on the presumption of economic benefits commensurate with the size of the project.

Comment Replies

	Topic	Comment	By	Response
9	Evaluation and Scoring	It should be made clear that any reasonable "minimum threshold criteria" may be used as ranking criteria (if/as reasonable at all) for project prioritization (per Schedule 3) but are not independent criteria upon which projects can be disqualified. If there is a minimum threshold score (as evaluated in Schedule 3) that a project must meet to be qualified, that score must be presented and justified based on the statutory criteria (eg, "ability to build"). Applicants should be given notice and an opportunity to cure any such deficiencies within short time after the notice, especially if (after reviewing all applicants) NGrid has not met the required annual target.	Washington County Regional Planning Council	The application establishes only two threshold requirements: (1) a schedule for completion within 18 months, and (2) submission of an application for interconnection and completion of an interconnection feasibility study. All other requested information is used in the development of a non-price score, and no single category is treated as a threshold requirement. National Grid reserved the right to reject any project not receiving a minimum score to deal with the possibility that there could be projects meeting (or even exceeding) the threshold requirements, yet not making a credible demonstration that the project is likely to be completed and operated as proposed. It is not feasible to establish such a score in advance, as non-price scoring as a general matter is often driven by how projects compare on a relative basis. It would be expected, however, that some projects may clearly rank well below others in the same or similar classes. The enrollment periods are short and meant to provide rapid turnaround of contracts. As such, cure periods are not feasible. Projects may reapply in future enrollment periods with updated information.
10	Evaluation and Scoring	There is no requirement to meet minimum standards for bidder experience mandated by statute and schedule 3 indicates it is one among many criteria that are to be evaluated in assessing.	Washington County Regional Planning Council	Bidder's experience is a factor in evaluating a project's "ability to build" (Section 39-26.2-6 (a)) and would help discriminate, for example, between two Large DG Projects with comparable pricing and operation dates. A bidder with more experience would more likely meet the required completion date and other critical milestones.

Comment Replies

	Topic	Comment	By	Response
11	Evaluation and Scoring	What is the non-price evaluation minimum score for qualification and how is that justified according to the statutory selection criteria?	Washington County Regional Planning Council	See responses to #9 and #10.
12	Evaluation and Scoring	There is no requirement to demonstrate site control at the time of filing though it is reasonable to expect an explanation of how site control will be obtained.	Washington County Regional Planning Council	The application seeks to find out to what extent site control has been established, for example, this can be demonstrated with a letter of intent.

Comment Replies

	Topic	Comment	By	Response
13	Evaluation and Scoring	The Act specifies that for small DG projects, National Grid will enter into contracts on a first-come, first-served basis (at 39-26.2.6(b)). If one interprets that as when an application is received, then it is unclear why the submitted rules (Schedule 3 of the application and enrollment process rules) weighs non-price scoring equally with the completion date score. The Act seems to specify that "completion date" or, more specifically, how close a project is to completion, is relevant only in cases of oversubscription (at 39-26.2-6(d)). Moreover, at the time the application is submitted, it is difficult to determine with any certainty the eventual completion date of a project. Removal of completion date as scoring criteria may be warranted.	Division	National Grid believes the statute requires that the evaluation include completion date since all other things being equal, the projects with nearest completion date and highest likelihood of deployment should be selected. The proposed methodology includes both completion date and non-price factors, providing flexibility in the evaluation.
14	Evaluation and Scoring	The electric distribution company shall make available the final project scoring for all applications in each solicitation round.	RI Renewable Energy Fund	Enrollment applications should be treated as confidential by National Grid. All information associated with the application, including National Grid's internal evaluation of projects, should be kept confidential except as contained in Standard Contracts filed with the RI PUC, and as may be necessary to report results to OER or the Board.
15	Evaluation and Scoring	Projects that are identified as failing to meet any minimum threshold requirement shall be provided an explanation as to applicant's deficiencies.	RI Renewable Energy Fund	See responses to # 9 and #14.

Comment Replies

	Topic	Comment	By	Response
16	Evaluation and Scoring	Applicants should be given notice and an opportunity to cure any such deficiencies within short time after the notice, especially if (after reviewing all applicants) NGrid has not met the required annual target.	Washington County Regional Planning Council	See responses to # 9 and #14.
17	FCM	Delete section 2.8	Washington County Regional Planning Council	This issue was also raised by the Standard Contracts Working Group. In order to capture capacity revenue these projects may provide, National Grid has now agreed to be the "Project Sponsor" for all Large Distributed Generation Facilities, qualify the Facility as an Existing Capacity Resource in the Forward Capacity Market after the Commercial Operation, and participate in each Forward Capacity Market auction thereafter. National Grid reserves the right to be the "Project Sponsor" for Small DG Facilities, after consultation with the Division and the Board. If and when National Grid participates as "Project Sponsor" on behalf of any Facility, that Facility must support National Grid, as required, to qualify the Facility as an Existing Capacity Resource in the Forward Capacity Market. Any capacity revenues will flow to National Grid, and will be used as an offset to the contract cost in determining the net cost to distribution customers. The application will be revised to reflect this change.
18	FCM	Delete section 2.8	PPL	See response to #17.

Comment Replies

	Topic	Comment	By	Response
19	FCM	Delete section 2.8	RI Renewable Energy Fund	See response to #17.
20	Interconnection Progress Prior Enrollment	The requirement for the applicant to have filed an interconnection application and developed a feasibility study upon submission of their application is overly burdensome. Given the new statutory requirements for interconnection and the requirement to complete the project within 18 months of signing the DG contract, developer should merely have to explain the feasibility of interconnection at the time of their application.	Washington County Regional Planning Council	Feasibility of interconnection is a key factor evaluating a project's ability to build. This feasibility study would enable a project to identify any major issues regarding interconnection and/or associated costs that might inhibit a project's ability to build due to technical or economic factors.
21	Interconnection Progress Prior Enrollment	The requirement to have the applicant have submitted an interconnection application and have a completed feasibility study is "overly burdensome" and "commercially impractical".	RI Renewable Energy Fund	See response to #20.
22	RI language	Remove "Rhode Island Load Zone" and all references to RI.	Washington County Regional Planning Council	Edits will be made to the application.
23	RI language	Remove "Rhode Island Load Zone" and all references to RI.	PPL	Edits will be made to the application.

Comment Replies

	Topic	Comment	By	Response
24	RI language	Remove "Rhode Island Load Zone" and replace with "electric distribution company's load zone"	RI Renewable Energy Fund	Edits will be made to the application.
25	Metering requirements	The Act's requirement of installation of an output meter on each DG facility is not explicitly mentioned in the application or rules, though it is an implicit requirement for participation in NEPOOL GIS. This requirement could be made explicit in a footnote, but this is not absolutely necessary.	Division	Edits will be made to the application.
26	Performance guarantee	The application and enrollment package does mention the performance guarantee in a footnote, but there is no mention of the caps on these guarantees. Though these funds are only due at contract execution, the cap figures should be mentioned in the package.	Division	Edits will be made to application.
27	RECs	Project owners may be required to register and ensure the project's eligibility for renewable energy credits and then designate NGrid as the recipient of the RECs but it should be made clear that after that point NGrid must administer eligibility for RECs; administrative burden and risk related to its fulfillment.	Washington County Regional Planning Council	The DG facility must qualify their products with the applicable agencies and National Grid will take title once the RECs land in National Grid's GIS account. There is no further obligation of the project owner once RECs are received in the NEPOOL GIS account of Narragansett Electric.
28	RECs	REC eligibility, upon signing of the contracts, should shift to the utility.	PPL	Maintaining REC eligibility is clearly a responsibility of the project owner.

Comment Replies

	Topic	Comment	By	Response
29	RECs	While the handling of the RECs are not specifically addressed in the application, it would be important to note that RECs should be handled in a similar manner as FCM payments - the obligation and responsibility to sell RECs, as needed, to fulfill any electric distribution company requirements, should be the responsibility of the electric distribution company. In addition, the same provision and opportunity regarding "aggregation" services shall also be afforded to REC transactions, as necessary and appropriate.	RI Renewable Energy Fund	See response to #27 and #28.
30	Typos	Page 4, section 2.1 - notice of enrollment 5 days, sign contract in 2 days; Schedule 1 allows 30 days for contract execution.	Washington County Regional Planning Council	Schedule 1 in the filed enrollment application is intended as a placeholder. For each enrollment period, Schedule 1 will be replaced with a specific timeline for that enrollment. The requirement for an applicant to make a decision to move forward with contract signing within five days of being informed by National Grid is in the statute. The tentative timeline in Schedule 1 allows for evaluation of applications and execution of contracts within a period of approximately 30 days, which will have to be drastically shortened in the 2011 enrollment.
31	Typos	Page 7, Section 2.11 changed centered format.	Washington County Regional Planning Council	Edits will be made to the application.