

TORAY PLASTICS (AMERICA), INC.

c/o William P. Short III

44 West 62nd Street

P.O. Box 2371773

New York, New York 10023-7173

(917) 206-0001; (201) 970-3707

w.shortiii@verizon.net

September 13, 2011

Rhode Island Public Utilities Commission
Attn: Renewable Energy Resources Eligibility
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Application of Toray Plastics (America), Inc. for Certification of its Toray Solar #1 as a Rhode Island New Renewable Energy Resource

Dear Sir:

Attached please find an application for certification by the Rhode Island Public Utilities Commission (the "Commission") of the Toray Solar # 1 (the "Project" or the "Facility") of Toray Plastics (America), Inc. ("Toray") as a Rhode Island New Renewable Energy Resource (the "Application").

Toray is a Domestic Profit Corporation with its principal place of business at 50 Belver Avenue, North Kingstown, Rhode Island 02852-7500. Toray Plastics (America), Inc. is a subsidiary of Toray Industries, Inc., the world leader in synthetic fibers and textiles, carbon fibers, plastics, chemicals, pharmaceuticals and high performance films. Toray Industries, Inc. was established in 1926 as Toyo Rayon Company. Toray Industries, Inc. world headquarters are located in Tokyo, Japan. Toray Industries, Inc. operates 127 facilities in 18 countries around the world with over 32,000 employees worldwide and annual sales exceed \$13 billion, USD.

Founded in 1985, Toray's capacity to bring polypropylene and polyester innovations to market has grown exponentially. Toray is comprised of two locations, North Kingstown, Rhode Island and Front Royal, Virginia. The North Kingstown, Rhode Island facility is responsible for manufacturing oriented polyester and polypropylene films marketed to the magnetic tape, food packaging, capacitor and industrial markets. The Front Royal, Virginia plant is a global leader in manufacturing polyolefin foams for the automotive and flooring markets.

To date, Toray have invested more than \$650 million in its U.S. operations increasing its production capabilities by over 1,000% in the past 20 years. Additional information on Toray may be found at www.toraytpa.com.

The solar photovoltaic system consists of 2 fields, south and west, with a total DC wattage of 445.5 KW. The solar photovoltaic panels will be mounted on single axis, ground mounted, trackers that track the sun from the east to the west throughout the day. The south field will contain seventy-one single axis tracking systems and 1,562 solar photovoltaic panels rated at 421.74 KW (DC). The south field PV tracking systems are connected to a high performance 375 KW inverter to provide power to the Toray Fan building. The west field will contain four single axis tracking systems and 88 solar photovoltaic panels rated at 23.760 KW (DC). The west field PV tracking systems are connected to a high performance 30 KW inverter to provide power to Main Office Building. The inverters provide DC to AC conversion with efficiency greater than 97%. The output voltage provided to the buildings are 480 VAC 3 Phase.

For purposes of responding to inquiries regarding the application, persons should contact the following:

Primary Contact

William P. Short III
Consultant
44 West 62nd Street
P.O. Box 237173
New York, New York 10023-7173
(917) 206-0001 Office
(201) 970-3707 Cell
w.shortiii@verizon.net

Secondary Contact

Steve Kerr
Mechanical Engineer
Toray Plastics (America), Inc.
50 Belver Avenue
North Kingstown, Rhode Island 02852
(401) 294-1550, x-4225 Office
(401) 782-7142 Cell
steve.kerr@toraytpa.com

Upon your review of our application, if you have any questions on comments, please do not hesitate to contact either Steve Kerr or myself.

Sincerely yours,

William P. Short III

attachments

cc: Steve Kerr

LISTS OF ATTACHMENTS

Application for Certification of the Toray Solar #1, dated September 13, 2011

Aggregation Agreement

RIPUC Use Only

Date Application Received: ___ / ___ / ___
Date Review Completed: ___ / ___ / ___
Date Commission Action: ___ / ___ / ___
Date Commission Approved: ___ / ___ / ___

GIS Certification #:

Non-NEPOOL #33408

RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM

**The Standard Application Form
Required of all Applicants for Certification of Eligibility of Renewable Energy Resource
(Version 7 – June 11, 2010)**

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
Pursuant to the Renewable Energy Act
Section 39-26-1 et. seq. of the General Laws of Rhode Island**

NOTICE:

When completing this Renewable Energy Resources Eligibility Form and any applicable Appendices, please refer to the State of Rhode Island and Providence Plantations Public Utilities Commission Rules and Regulations Governing the Implementation of a Renewable Energy Standard (RES Regulations, Effective Date: January 1, 2006), and the associated RES Certification Filing Methodology Guide. All applicable regulations, procedures and guidelines are available on the Commission's web site: www.ripuc.org/utilityinfo/res.html. Also, all filings must be in conformance with the Commission's Rules of Practice and Procedure, in particular, Rule 1.5, or its successor regulation, entitled "Formal Requirements as to Filings."

- Please complete the Renewable Energy Resources Eligibility Form and Appendices using a typewriter or black ink.
- Please submit one original and three copies of the completed Application Form, applicable Appendices and all supporting documentation to the Commission at the following address:

Rhode Island Public Utilities Commission
89 Jefferson Blvd
Warwick, RI 02888

Attn: Renewable Energy Resources Eligibility

In addition to the paper copies, electronic/email submittals are required under Commission regulations. Such electronic submittals should be sent to: Luly E. Massaro, Commission Clerk at lmassaro@puc.state.ri.us

- In addition to filing with the Commission, Applicants are required to send, electronically or electronically and in paper format, a copy of the completed Application including all attachments and supporting documentation, to the Division of Public Utilities and Carriers and to all interested parties. A list of interested parties can be obtained from the Commission's website at www.ripuc.org/utilityinfo/res.html.
- Keep a copy of the completed Application for your records.
- The Commission will notify the Authorized Representative if the Application is incomplete.
- Pursuant to Section 6.0 of the RES Regulations, the Commission shall provide a thirty (30) day period for public comment following posting of any administratively complete Application.
- Please note that all information submitted on or attached to the Application is considered to be a public record unless the Commission agrees to deem some portion of the application confidential after consideration under section 1.2(g) of the Commission's Rules of Practice and Procedure.
- In accordance with Section 6.2 of the RES Regulations, the Commission will provide prospective reviews for Applicants seeking a preliminary determination as to whether a facility would be eligible prior to the formal certification process described in Section 6.1 of the RES Regulations. Please note that space is provided on the Form for applicant to designate the type of review being requested.
- Questions related to this Renewable Energy Resources Eligibility Form should be submitted in writing, preferably via email and directed to: Luly E. Massaro, Commission Clerk at lmassaro@puc.state.ri.us

SECTION I: Identification Information

- 1.1 Name of Generation Unit (sufficient for full and unique identification):
Toray Solar #1
- 1.2 Type of Certification being requested (check one):
 Standard Certification Prospective Certification (Declaratory Judgment)
- 1.3 This Application includes: (Check all that apply)¹
- APPENDIX A: Authorized Representative Certification for Individual Owner or Operator
 - APPENDIX B: Authorized Representative Certification for Non-Corporate Entities Other Than Individuals
 - APPENDIX C: Existing Renewable Energy Resources
 - APPENDIX D: Special Provisions for Aggregators of Customer-sited or Off-grid Generation Facilities
 - APPENDIX E: Special Provisions for a Generation Unit Located in a Control Area Adjacent to NEPOOL
 - APPENDIX F: Fuel Source Plan for Eligible Biomass Fuels
- 1.4 Primary Contact Person name and title:
William P. Short III, Consultant
- 1.5 Primary Contact Person address and contact information:
Address: **P.O. Box 237173**
New York, New York 10023-7173
Phone: **(917) 206-0001** Fax: **(917) 206-0001**
Email: **w.shortiii@verizon.net**
- 1.6 Backup Contact Person name and title:
Steve Kerr, Mechanical Engineer
- 1.7 Backup Contact Person address and contact information:
Address: **Toray Plastics (America), Inc.**
50 Belver Avenue
North Kingstown, Rhode Island 02852-7500
Phone: **(401) 294-1550 , x-4225** Fax: **(401) 295-9346**
Email: **steve.kerr@toraytpa.com**

¹ Please note that all Applicants are required to complete the Renewable Energy Resources Eligibility Standard Application Form and all of the Appendices that apply to the Generation Unit or Owner or Operator that is the subject of this Form. Please omit Appendices that do not apply.

1.8 Name and Title of Authorized Representative (*i.e.*, the individual responsible for certifying the accuracy of all information contained in this form and associated appendices, and whose signature will appear on the application):

William P. Short III, Consultant

Appendix A or B (as appropriate) completed and attached? Yes No N/A

1.9 Authorized Representative address and contact information:

Address: **P.O. Box 237173**

New York, New York 10023-7173

Phone: **(917) 206-0001**

Fax: **(917) 206-0001**

Email: **w.shortiii@verizon.net**

1.10 Owner name and title: **Steve Kerr, Mechanical Engineer**

1.11 Owner address and contact information:

Address: **Toray Plastics (America), Inc.**

50 Belver Avenue

North Kingstown, Rhode Island 02852-7500

Phone: **(401) 294-1550 , x-4225**

Fax: **(401) 295-9346**

Email: **steve.kerr@toraytpa.com**

1.12 Owner business organization type (check one):

Individual

Partnership

Corporation

Other: _____

1.13 Operator name and title: **Steve Kerr, Mechanical Engineer**

1.14 Operator address and contact information:

Address: **Toray Plastics (America), Inc.**

50 Belver Avenue

North Kingstown, Rhode Island 02852-7500

Phone: **(401) 294-1550 , x-4225**

Fax: **(401) 295-9346**

Email: **steve.kerr@toraytpa.com**

1.15 Operator business organization type (check one):

Individual

Partnership

Corporation

Other: _____

SECTION II: Generation Unit Information, Fuels, Energy Resources and Technologies

2.1 ISO-NE Generation Unit Asset Identification Number or NEPOOL GIS Identification Number (either or both as applicable): Non-NEPOOL Account # 33408

2.2 Generation Unit Nameplate Capacity: 0.405 MW (AC equivalent)

2.3 Maximum Demonstrated Capacity: 0.405 MW (AC equivalent)

2.4 Please indicate which of the following Eligible Renewable Energy Resources are used by the Generation Unit: (Check ALL that apply) – *per RES Regulations Section 5.0*

Direct solar radiation

The wind

Movement of or the latent heat of the ocean

The heat of the earth

Small hydro facilities

Biomass facilities using Eligible Biomass Fuels and maintaining compliance with all aspects of current air permits; Eligible Biomass Fuels may be co-fired with fossil fuels, provided that only the renewable energy fraction of production from multi-fuel facilities shall be considered eligible.

Biomass facilities using unlisted biomass fuel

Biomass facilities, multi-fueled or using fossil fuel co-firing

Fuel cells using a renewable resource referenced in this section

2.5 If the box checked in Section 2.4 above is “Small hydro facilities”, please certify that the facility’s aggregate capacity does not exceed 30 MW. – *per RES Regulations Section 3.32*

← check this box to certify that the above statement is true

N/A or other (please explain) _____

2.6 If the box checked in Section 2.4 above is “Small hydro facilities”, please certify that the facility does not involve any new impoundment or diversion of water with an average salinity of twenty (20) parts per thousand or less. – *per RES Regulations Section 3.32*

← check this box to certify that the above statement is true

N/A or other (please explain) _____

2.7 If you checked one of the Biomass facilities boxes in Section 2.4 above, please respond to the following:

A. Please specify the fuel or fuels used or to be used in the Unit: _____

B. Please complete and attach Appendix F, Eligible Biomass Fuel Source Plan.

Appendix F completed and attached?

Yes No N/A

- 2.8 Has the Generation Unit been certified as a Renewable Energy Resource for eligibility in another state's renewable portfolio standard?
 Yes No If yes, please attach a copy of that state's certifying order.
Copy of State's certifying order attached? Yes No N/A

SECTION III: Commercial Operation Date

Please provide documentation to support all claims and responses to the following questions:

- 3.1 Date Generation Unit first entered Commercial Operation: 0 8 / 2 2 / 1 1 at the site.

If the commercial operation date is after December 31, 1997, please provide independent verification, such as the utility log or metering data, showing that the meter first spun after December 31, 1997. This is needed in order to verify that the facility qualifies as a New Renewable Energy Resource.

Documentation attached? Yes No N/A

- 3.2 Is there an Existing Renewable Energy Resource located at the site of Generation Unit?

Yes
 No

- 3.3 If the date entered in response to question 3.1 is earlier than December 31, 1997 or if you checked "Yes" in response to question 3.2 above, please complete Appendix C.

Appendix C completed and attached? Yes No N/A

- 3.4 Was all or any part of the Generation Unit used on or before December 31, 1997 to generate electricity at any other site?

Yes
 No

- 3.5 If you checked "Yes" to question 3.4 above, please specify the power production equipment used and the address where such power production equipment produced electricity (attach more detail if the space provided is not sufficient):

SECTION IV: Metering

- 4.1 Please indicate how the Generation Unit’s electrical energy output is verified (check all that apply):
- ISO-NE Market Settlement System
 - Self-reported to the NEPOOL GIS Administrator
 - Other (please specify below and see Appendix D: Eligibility for Aggregations):
-

Appendix D completed and attached? Yes No N/A

SECTION V: Location

- 5.1 Please check one of the following that apply to the Generation Unit:
- Grid Connected Generation
 - Off-Grid Generation (not connected to a utility transmission or distribution system)
 - Customer Sited Generation (interconnected on the end-use customer side of the retail electricity meter in such a manner that it displaces all or part of the metered consumption of the end-use customer)

5.2 Generation Unit address: Toray Plastics (America), Inc.
50 Belver Avenue
North Kingstown, Rhode Island 02852-7500

5.3 Please provide the Generation Unit’s geographic location information:

A. Universal Transverse Mercator Coordinates: _____

B. Longitude/Latitude: 41° 35’34.20” / 71° 25’38.50”

5.4 The Generation Unit located: (please check the appropriate box)

- In the NEPOOL control area
- In a control area adjacent to the NEPOOL control area
- In a control area other than NEPOOL which is not adjacent to the NEPOOL control area ← *If you checked this box, then the generator does not qualify for the RI RES – therefore, please do not complete/submit this form.*

5.5 If you checked “In a control area adjacent to the NEPOOL control area” in Section 5.4 above, please complete Appendix E.

Appendix E completed and attached? Yes No N/A

SECTION VI: Certification

6.1 Please attach documentation, using one of the applicable forms below, demonstrating the authority of the Authorized Representative indicated in Section 1.8 to certify and submit this Application.

Corporations

If the Owner or Operator is a corporation, the Authorized Representative shall provide **either**:

- (a) Evidence of a board of directors vote granting authority to the Authorized Representative to execute the Renewable Energy Resources Eligibility Form, **or**
- (b) A certification from the Corporate Clerk or Secretary of the Corporation that the Authorized Representative is authorized to execute the Renewable Energy Resources Eligibility Form or is otherwise authorized to legally bind the corporation in like matters.

Evidence of Board Vote provided? Yes No N/A

Corporate Certification provided? Yes No N/A

Individuals

If the Owner or Operator is an individual, that individual shall complete and attach APPENDIX A, or a similar form of certification from the Owner or Operator, duly notarized, that certifies that the Authorized Representative has authority to execute the Renewable Energy Resources Eligibility Form.

Appendix A completed and attached? Yes No N/A

Non-Corporate Entities

(Proprietorships, Partnerships, Cooperatives, etc.) If the Owner or Operator is not an individual or a corporation, it shall complete and attach APPENDIX B or execute a resolution indicating that the Authorized Representative named in Section 1.8 has authority to execute the Renewable Energy Resources Eligibility Form or to otherwise legally bind the non-corporate entity in like matters.

Appendix B completed and attached? Yes No N/A

6.2 Authorized Representative Certification and Signature:

I hereby certify, under pains and penalties of perjury, that I have personally examined and am familiar with the information submitted herein and based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties, both civil and criminal, for submitting false information, including possible fines and punishment. My signature below certifies all information submitted on this Renewable Energy Resources Eligibility Form. The Renewable Energy Resources Eligibility Form includes the Standard Application Form and all required Appendices and attachments. I acknowledge that the Generation Unit is obligated to and will notify the Commission promptly in the event of a change in a generator's eligibility status (including, without limitation, the status of the air permits) and that when and if, in the Commission's opinion, after due consideration, there is a material change in the characteristics of a Generation Unit or its fuel stream that could alter its eligibility, such Generation Unit must be re-certified in accordance with Section 9.0 of the RES Regulations. I further acknowledge that the Generation Unit is obligated to and will file such quarterly or other reports as required by the Regulations and the Commission in its certification order. I understand that the Generation Unit will be immediately de-certified if it fails to file such reports.

Signature of Authorized Representative:

SIGNATURE:

William P. Short III

DATE:

9/13/11

Consultant

(Title)

Toray Plastics (America), Inc.
50 Belver Avenue
North Kingstown, Rhode Island 02852
(401) 667-4504 Office
shigeru.osada@toraytpa.com

September 13, 2011

Rhode Island Public Utilities Commission
89 Jefferson Blvd
Warwick, RI 02888
Attn: Renewable Energy Resources Eligibility

Re: Rhode Island New Renewable Energy Resource Application For Toray Solar #1

Dear Ms. Massaro:

Per the application instructions of the Rhode Island Public Utilities Commission ("RI PUC") for a renewable energy resource to become certified as a Rhode Island New renewable energy resource, I, Shigeru Osada, certify that I, as the Senior Vice President of Toray Plastics (America), Inc. am qualified to make the following representation.

William P. Short III, a consultant to Toray Plastics (America), Inc., is an agent for Toray Plastics (America), Inc. Mr. Short is qualified to represent Toray Plastics (America), Inc. with respect to its request to certify its solar facility as a Rhode Island New renewable energy resource.

If, upon your review of my letter, you should have any questions about this matter, please do not hesitate to contact me directly.

Sincerely yours,


Shigeru Osada

State: Rhode Island
County: Kent

I, Lisa A. Ahart as a notary public, certify that I witnessed the signature of the above named Shigeru Osada, and that said person stated that he/she is authorized to execute this resolution, and the individual verified his/her identity to me, on this date: August 31, 2011.

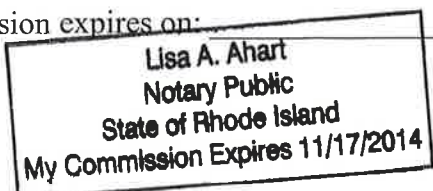
SIGNATURE:

Lisa A. Ahart

DATE:

8-31-11

My commission expires on:



NOTARY SEAL:

APPENDIX D
(Revised 6/11/10)
(Required of Applicants Seeking Eligibility for Customer-Sited and/or Off-Grid Generation Facilities and Associated Aggregations)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM

Pursuant to the Renewable Energy Act
Section 39-26-1 et. seq. of the General Laws of Rhode Island

Customer-sited and Off-grid Generation Facilities located in Rhode Island may be certified as an eligible resource if their NEPOOL GIS Certificates are created by way of an aggregation of Generation Units using the same generation technology, and so long as the aggregation is certified by the Commission. Please complete the following and attach documentation, as necessary to support all responses:

D.1 Please identify the location(s) in Rhode Island of each Generation Unit that is interconnected on the End-use Customer's side of the retail electricity meter in such a manner that it displaces all or part of the metered consumption of the End-use Customer, or not connected to a utility transmission or distribution system.

[Toray Plastics \(America\), Inc.](#)

[50 Belver Avenue](#)

[North Kingstown, Rhode Island 02852-7500](#)

D.2 Please attach proposed procedures under which the aggregate Generation Units will operate ("Aggregation Agreement"). In accordance with Section 6.8.(iii) of the RES Regulations, the proposed Aggregation Agreement shall contain the following information:

(a) Name and contact information of the Aggregator Owner, to which these regulations and stipulations of certification shall apply, and who shall be the initial owner of any NEPOOL GIS Certifications so certified;

(b) Name, contact information, and qualifications of the Verifier. Qualifications shall include any information the applicant believes will assist the Commission in determining that the Verifier will accurately and efficiently carry out its duties. After receipt of the application, the Commission may require additional evidence of qualifications;

- (c) A declaration of any and all business or financial relations between Aggregator Owner and Verifier, which the Commission will use to evaluate the independence of the Verifier.²
- (c.1) The Aggregation Agreement shall include a statement indicating under what circumstances the Verifier would not be considered sufficiently independent of the individual Generation Unit, and that Generation Units not meeting this independence test would not be allowed to participate in the aggregation;
- (d) Type of technology that will be included in the aggregation, and statement that the aggregation will include only individual Generation Units that meet all the requirements of these regulations, for example physical location, vintage, etc. (All generators within the aggregation must be of the same technology and fuel type);
- (e) Proposed operating procedures for the aggregation, by which the Aggregation Owner shall ensure that individual Generation Units in the aggregation comply with all eligibility requirements and that the NEPOOL GIS Certificates created accurately represent generation;³
- (f) Description of how the Verifier will be compensated for its services by the aggregator. In no instances will an aggregation be certified in which the Verifier is compensated in a manner linked to the number of NEPOOL GIS Certificates created by the aggregation; and
- (g) Confirmation and a description of how, no less frequently than quarterly, the Verifier will directly enter into the NEPOOL GIS the quantity of energy production in the applicable time period from each Generation Unit in the aggregation. The entry of generation data by the Verifier must be through an interface designated for this purpose by the NEPOOL GIS and in accordance with NEPOOL GIS Operating Rules applicable to Third-Party Meter Readers, and to which the Aggregation Owner shall not have access⁴.

² Reasons for ruling that a Verifier is not sufficiently independent include, but are not limited to: i) If one entity owns, directly or indirectly, or if a natural person so owns, 10% or more of the voting stock or other equity interest in the other entity; ii) If 10% or more of the voting stock or other equity interests in both entities are owned, directly or indirectly, by the same entity or a natural person; or iii) If one entity is a natural person, and such entity or a member of such entity's immediate family is an officer, director, partner, employee or representative of the other entity.

³ At a minimum, these procedures will: i) require a determination by the Aggregation Owner that the Generation Unit is in compliance with these Renewable Energy Standard regulations and the Aggregation Agreement as approved by the Commission, and an independent determination by the Verifier that the Generation Unit exists; ii) require a meter reading procedure that allows the Verifier to read meters on the Generation Units; meter readings may be manual or remote and via the aggregators own system or via an independent system, but in all cases shall comply with NEPOOL GIS Operating Rules regarding metering; iii) require confirmation that Verifier will be entering the quantity of energy production in to the NEPOOL GIS system as described in paragraph (g) for NEPOOL GIS to create NEPOOL GIS Certificates; and OL GIS Certificates; and ; iv) include a procedure for the Verifier to report to the Commission on the results of their verification process.

⁴ Such generation data shall not include any generation data from previous time periods, except as provided for in this section. Output of less than one MWh by any single Generation Unit within the aggregation may be applied to the entire aggregation's generation, and generation of the aggregation less than one full MWh may be applied to the subsequent quarter in accordance with NEPOOL GIS Operating Rules.

D.3 Applicant must acknowledge that:

- (a) any changes to or deviations from the Aggregation Agreement will be considered a change in generator status, and will require recertification by the Commission;

← please check this box to acknowledge this requirement

N/A or other (please explain) _____

- (b) the Commission will be promptly notified of any changes to or deviations from the Aggregation Agreement; and

← please check this box to acknowledge this requirement

N/A or other (please explain) _____

- (c) in the event that notice of such changes or deviations is not promptly given, all Generation Units in the aggregation may be de-certified.

← please check this box to acknowledge this requirement

N/A or other (please explain) _____

D.4 Applicant must certify that:

If the Generation Unit (or aggregation of generation units) is a Customer-sited or Off-grid Generation Resource, as defined in Section 39-26-2.4 of the General Laws of Rhode Island and Section 3.26 of the RES Regulations, respectively, the associated Generation Attributes have not otherwise been, nor will be sold, retired, claimed or represented as part of electrical energy output or sales, or used to satisfy obligations in jurisdictions other than Rhode Island.

← please check this box to certify that this statement is true

N/A or other (please explain) _____

Part D.2

AGGREGATION AGREEMENT

TORAY SOLAR #1

(a) Name and contact information of the Generator Owner.

The generator owner, to which these regulations and stipulations of certifications apply and is their initial owner of any NEPOOL GIS certificates so certified, is the Toray Plastics (America), Inc. (“Toray”). The designated Toray representative and contact is Steve Kerr, Mechanical Engineer. Mr. Kerr’s contact information is:

Steve Kerr
Mechanical Engineer
Toray Plastics (America), Inc.
50 Belver Avenue
North Kingstown, Rhode Island 02852
(401) 294-1550, x-4225 Office
(401) 782-7142 Cell
steve.kerr@toraytpa.com

(b) Name, contact information and qualification of the Verifier.

The verifier of the solar facility output and resultant certificates will be Mr. William P. Short III, consultant. Mr. Short has the following qualifications:

- Undergraduate and graduate degrees in electrical engineering from Duke University and University of Pennsylvania, respectively;
- Participant in the drafting of and knowledgeable about the Rhode Island Renewable Energy Standard regulations, including its Third Party Meter Reader regulations;
- Participant in the drafting of and knowledgeable about all other New England states renewable portfolio standards, either at the legislative or regulatory levels;
- Participant in the drafting of and knowledgeable about the Operating Rules of the NEPOOL Generation Information System;
- Qualified Independent Third-Party Meter Reader in Massachusetts, Independent Monitor in New Hampshire and Verifier in Connecticut. (There is no equivalent requirement in Maine);
- Third-Party Meter Reader of generation located in Massachusetts, Maine and New Hampshire for wind, solar, biomass, hydro and combined heat and power facilities.

Mr. Short's contact information is:

William P. Short III
Consultant
44 West 62nd Street (street address)
New York, New York 10023-7008
P.O. Box 237173 (mailing address)
New York, New York 10023-7173
(917) 206-0001 Office
(201) 970-3707 Cell
w.shortiii@verizon.net

(c) Business or financial relations between generator owner and Verifier.

Mr. Short has no direct or indirect ownership interest in Toray or any affiliate of this entity. Neither Mr. Short nor any immediate family member is an officer, director, partner, employee or representative of Toray. Mr. Short's business relationship with Toray is solely that of an independent consultant. Among his duties for Toray are the following:

Toray may request that Mr. Short assist Toray with the registration, creation and sale of the NEPOOL GIS certificates generated by its solar facility, located in North Kingstown, Rhode Island (the "Solar Facility"). Specifically, on Toray's behalf, Mr. Short will register its Solar Facility with the NEPOOL GIS. Mr. Short will also assist Toray in marketing its NEPOOL GIS certificates. Included in this work, Mr. Short will offer the NEPOOL GIS certificates directly to New England Distribution Companies in their periodic REC auctions, post for sale the NEPOOL GIS certificates on the NEPOOL GIS Bulletin Board; work with REC brokers on the sale of certificates to other New England Load Servicing Entities and assist in the documentation, including transfer of funds, from the sales of NEPOOL GIS certificates.

Toray may request that Mr. Short assist Toray with the registration of its Solar Facility as either a Massachusetts Solar Crave-Out or Massachusetts Class I renewable generation unit, a Connecticut Class I renewable energy source, a Rhode Island New Renewable energy resource, a New Hampshire Class II renewable energy source and a Maine Class I or Class II renewable resource to the extent that its Solar Facility is not presently certified as such sources.

Toray may request that Mr. Short be its Independent Third Party Meter Reader (as that term is defined by the Massachusetts Department of Energy Resources), Independent Monitor (as that term is defined by the New Hampshire Public Utilities Commission), Verifier (as that term is defined by the Connecticut Department of Public Utility Control) and Third Party Meter Reader (as that term is defined by the Rhode Island Public Utility Commission) for the NEPOOL GIS certificates generated by its Solar Facility.

(d) Circumstances where Verifier would not be considered sufficiently independent.

Since Mr. Short is paid a fixed fee for his services, there is no way, unless his consulting agreement is modified, that he cannot be qualified as a Third Party Meter Reader. If Mr. Short's business relationship should change with Toray (for example, he were to become

an officer, director, partner, employee or representative of Toray or he were to be paid based upon production by the solar facility), Toray will immediately inform the Commission of such modifications.

(e) Statement on the type of technology and number of technologies that will be included in the generation.

This is a single site aggregation and the generation technology is solar photovoltaic. The solar facility consists of 1,650 identical solar photovoltaic panels and associated equipment. No other generation technologies or fuel types will be included within this generation.

(f) Proposed operating procedures for the Generation.

- Mr. Short has visually seen and inspected the solar facility. He can, therefore, independently provide an opinion that the solar facility exists.
- Mr. Short will take meter readings monthly. He will verify annually the generator meter readings.
- Mr. Short will directly input the generation data directly into the NEPOOL GIS website.
- Mr. Short will respond promptly to any Commission or Division questions, surveys or reports requested.
- Mr. Short will report any unexplained deviation in production from the solar facility to the Commission and the Division.

(g) Description of how the Verifier will be compensated for its services.

During the term of consulting agreement, Mr. Short will be paid a flat, fixed fee for his services. His agreement, which runs until the end of the 2013 compliance year, can be terminated by Toray at anytime without cause provided that Mr. Short has been paid the remaining balance of his fixed fee. None of Mr. Short's compensation will be subject to adjustment for the increase or decrease in production of Certificates by the solar facility.