

June 26, 2015

**VIA HAND DELIVERY AND ELECTRONIC MAIL**

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

**RE: Docket 4536-A – Renewable Energy (RE) Growth Program  
Certifying the Rhode Island RE Growth Small-Scale Solar Aggregation as an  
Eligible Renewable Energy Resource**

Dear Ms. Massaro:

To comply with the Renewable Energy Standard (RES), The Narragansett Electric Company d/b/a National Grid (the Company) and its affiliates, seek to simplify the process of certifying small-scale solar distributed generation projects that enroll in the RE Growth Program. The Company has established a single New England Power Pool Generation Information System (NEPOOL GIS) asset number. Upon approval by the Rhode Island Public Utilities Commission (PUC), the Company will act as Aggregator Owner and Verifier, as allowed in the RES Regulations, for the purpose of certifying an aggregation of small-scale solar projects enrolled in the RE Growth Program as Eligible Renewable Energy Resources under a single Rhode Island Certification number. New projects will be added to the aggregation as they are enrolled in the RE Growth Program.

The enrollment for small-scale solar projects in the RE Growth Program commenced on June 15, 2015, and RES approval is a condition of payment under the RE Growth Tariffs. The Company is seeking certification of the aggregation prior to August 1st so the Company can commence paying projects that elect to be in the aggregation in the August billing cycle.

The RE Growth Statute (R.I. Gen. Laws § 39-26.6-12(c)) requires that at least 3 MW of nameplate capacity be carved out exclusively for small-scale solar projects in each of the first four program years. Assuming that an average small-scale solar project is 10 kW, the PUC could receive up to 300 applications for certification per year, requiring 300 associated dockets each year. The Company submits that it may be administratively burdensome for the PUC to process and administer this many applications each year. Moreover, each small-scale solar project would be expected to navigate both the PUC procedures to become certified and the NEPOOL GIS rules and processes to establish an account. As such, the Company believes that it would be in the best interest of enrolling customers for the PUC to rule on the Company's proposal outlined in this letter and enclosed documents by the end of July. Our goal is simply to provide a streamlined solution for individual customers to meet these requirements and to avoid any delay in being able to pay new projects for their output.

As required by the RE Growth Statute, all small-scale solar projects that are awarded COEs will be up to and including 25 kW nameplate capacity, will be located in the Rhode Island load zone, will be solar photovoltaic resources and, therefore, Eligible Renewable Energy Resources as defined by Rhode Island General Laws section 39-26-5, and will not be already operating before June 15, 2015. Finally, as a condition to participating in the RE Growth Program, as noted in the approved RE Growth Program tariffs, customers must cooperate with the Company so that the Company can aggregate their Renewable Energy Certificates (RECs). Pursuant to the approved RE Growth Tariffs, the Company has the right and title to all of the RECs produced by the aggregated projects, and the Company and its affiliates will sell the RECs and credit the proceeds back to all distribution customers in rates.

In summary:

- The Company has created a single NEPOOL GIS Generation Unit Asset ID number for the aggregation.
- The Company requests the PUC certify the aggregation under one Rhode Island certification number.
- The aggregation will be capped at 12 MW for all small scale solar projects to be enrolled over the five years of the program. The Company would seek to increase the cap if the Distributed Generation Board increases the capacity of small scale solar projects under the RE Growth Program.
- The Company will be the Verifier and report meter data for the aggregation to the NEPOOL GIS.
- The Company will be the Aggregator Owner and sell the RECs as required by the RE Growth Statute and credit the proceeds back to distribution customers in rates.
- The Company will update the PUC quarterly with a list of all projects that have been either added to or removed from the certified aggregation and that have reached commercial operation. In addition to project specific details and status, the list will also contain the following details:
  - Total kilowatt count in the certified aggregation
  - Total kilowatts that have been removed (projects that have left the program)
  - Total kilowatt count for projects that have begun commercial operation
  - Total kilowatt count for projects that have been added, but have not yet begun commercial operation

Luly Massaro, Commission Clerk  
Docket 4536-A – Renewable Energy (RE) Growth Program  
Certifying the Rhode Island RE Growth Small-Scale Solar Aggregation as an  
Eligible Renewable Energy Resource  
June 26, 2015  
Page 3 of 3

This letter includes the following two document:

1. Renewable Energy Resource Eligibility Form seeking eligibility for the small- scale solar aggregation (Attachment 1). This form includes:
  - Appendix A to the Renewable Energy Resource Eligibility Form – National Grid is required by the NEPOOL GIS, the PUC, and the Massachusetts Department of Energy Resources to obtain authorization from each project owner. Therefore, the Company has provided a simplified authorization form for each project owner to sign as required by all three entities; and
  - Appendix D to the Renewable Energy Resource Eligibility Form and Aggregation Agreement.
2. An illustrative example (in Excel spreadsheet format) of the detailed list of all small scale solar projects in the certified aggregation with sufficient details to enable the PUC to review and approve each site. (Attachment 2)

The Company will make quarterly filings containing:

1. An update to the detailed list of all small-scale solar projects that have been awarded COEs to be added to the certified aggregation and any projects that have been removed from the certified aggregation.
2. Appendix A to the Renewable Energy Resource Eligibility Form – Authorizations from project owners that have been added to the certified aggregation.

Thank you for your attention to this matter. If you have any questions, please contact me at (781) 907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4536-A Service List  
Leo Wold, Esq.  
Steve Scialabba, Division

Service List

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

Copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



\_\_\_\_\_  
Joanne M. Scanlon

June 26, 2015

Date

**Docket No. 4536-A National Grid Tariff Advice Filing for Renewable Energy Growth Program (RE Growth Program) and Solicitation & Enrollment Process Rules for 2015**

**Docket No. 4536-B RI Distributed Generation Board (DG Board) Report and Recommendation Regarding 2015 Renewable Energy Growth Classes, Ceiling Prices and Targets**

Service List updated 4/2/15

<b>Parties' Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
Celia B. O'Brien, Esq. Raquel J. Webster, Esq. National Grid 280 Melrose Street Providence, RI 02907	<a href="mailto:Celia.obrien@nationalgrid.com">Celia.obrien@nationalgrid.com</a> ;	781-907-2153
	<a href="mailto:Raquel.webster@nationalgrid.com">Raquel.webster@nationalgrid.com</a> ;	781-907-2121
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
	<a href="mailto:Amy.tabor@nationalgrid.com">Amy.tabor@nationalgrid.com</a> ;	
	<a href="mailto:Jeanne.lloyd@nationalgrid.com">Jeanne.lloyd@nationalgrid.com</a> ;	
	<a href="mailto:Corinne.didomenico@nationalgrid.com">Corinne.didomenico@nationalgrid.com</a> ;	
John K. Habib, Esq. (for NGrid) Keegan Werlin LLP 265 Franklin St. Boston, MA 02110-3113	<a href="mailto:jhabib@keeganwerlin.com">jhabib@keeganwerlin.com</a> ;	617-951-1400
Daniel W. Majcher, Esq. (DB Board) Dept. of Administration Division of Legal Services One Capitol Hill, 4 <sup>th</sup> Floor Providence, RI 02908	<a href="mailto:Daniel.majcher@doa.ri.gov">Daniel.majcher@doa.ri.gov</a> ;	401-222-8880
	<a href="mailto:Marion.Gold@energy.ri.gov">Marion.Gold@energy.ri.gov</a> ;	
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov</a> ;	
Jon Hagopian, Sr. Counsel Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Jon.hagopian@dpuc.ri.gov">Jon.hagopian@dpuc.ri.gov</a> ;	401-784-4775
	<a href="mailto:Steve.scialabba@dpuc.ri.gov">Steve.scialabba@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;	
	<a href="mailto:Joseph.shilling@dpuc.ri.gov">Joseph.shilling@dpuc.ri.gov</a> ;	
Richard Hahn Lacapra Associates 1 Washington Mall, 9th floor Boston, MA 02108	<a href="mailto:rhahn@lacapra.com">rhahn@lacapra.com</a> ;	
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Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Klyons@riag.ri.gov">Klyons@riag.ri.gov</a> ;	401-222-2424
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a> ;	
	<a href="mailto:jmunoz@riag.ri.gov">jmunoz@riag.ri.gov</a> ;	

Seth H. Handy, Esq. (Wind Energy Dev.) Handy Law, LLC 42 Weybosset St. Providence, RI 02903	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	401-626-4839
Mark Depasquale, Wind Energy Development	<a href="mailto:md@wedenergy.com">md@wedenergy.com</a> ;	
Jerry Elmer, Esq. Conservation Law Foundation 55 Dorrance Street Providence, RI 02903	<a href="mailto:jelmer@clf.org">jelmer@clf.org</a> ;	401-351-1102 Ext. 2012
<b>File an original &amp; 9 copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Amy.Dalessandro@puc.ri.gov">Amy.Dalessandro@puc.ri.gov</a> ;	

**RIPUC Use Only**

Date Application Received: \_\_\_/\_\_\_/\_\_\_  
Date Review Completed: \_\_\_/\_\_\_/\_\_\_  
Date Commission Action: \_\_\_/\_\_\_/\_\_\_  
Date Commission Approved: \_\_\_/\_\_\_/\_\_\_

GIS Certification #:

**NON51802**

## RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM

**The Standard Application Form  
Required of all Applicants for Certification of Eligibility of Renewable Energy Resource  
(Version 8 – December 5, 2012)**

**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](http://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  
Attn: Luly E. Massaro, Commission Clerk  
89 Jefferson Blvd  
Warwick, RI 02888

In addition to the paper copies, electronic/email submittals are required under Commission regulations. Such electronic submittals should be sent to [Res.filings@puc.ri.gov](mailto:Res.filings@puc.ri.gov).

- 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](http://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 [Res.filings@puc.ri.gov](mailto:Res.filings@puc.ri.gov).

**SECTION I: Identification Information**

1.1 Name of Generation Unit (sufficient for full and unique identification):  
**NATIONAL GRID RE GROWTH SMALL SCALE SOLAR AGGREGATION**

**As required by the Rhode Island Renewable Energy Growth (the RE Growth) Program, The Narragansett Electric Company d/b/a National Grid (“National Grid” or “Company”) will administer the program and the Company will possess the rights and title to the Renewable Energy Certificates (RECs) associated with the generation output of the aggregated projects.**

1.2 Type of Certification being requested (check one):  
 **Standard Certification**     Prospective Certification (Declaratory Judgment)

1.3 This Application includes: (Check all that apply)<sup>1</sup>

- APPENDIX A: Authorized Representative Certification for Individual Owner or Operator Please see attached “REC Assignment Form”**
- 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: **Kris Hornberger, Senior Trader**

1.5 Primary Contact Person address and contact information:  
Address: **100 Old Country Road, Second Floor**  
**Hicksville, New York 11801**  
**Phone: (516) 545-4563**  
**Email: [kris.hornberger@nationalgrid.com](mailto:kris.hornberger@nationalgrid.com)**

1.6 Backup Contact Person name and title: **James Ruebenacker, Manager**

1.7 Backup Contact Person address and contact information:  
Address: **100 Old Country Road, Second Floor**  
**Hicksville, New York 11801**  
**Phone: (516) 545-3227**

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<sup>1</sup> 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.

**Email: [james.ruebenacker@nationalgrid.com](mailto:james.ruebenacker@nationalgrid.com)**

- 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):

**John Vaughn, Vice President, Energy Procurement**

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

- 1.9 Authorized Representative address and contact information:

Address: **100 Old Country Road, Second Floor**  
**Hicksville, New York 11801**

- 1.10 Owner name and title: **Please see the attached list.**

- 1.11 Owner address and contact information:

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
Email: \_\_\_\_\_

- 1.12 Owner business organization type (check one): **Please see the attached list.**

Individual  
 Partnership  
 Corporation  
 Other: \_\_\_\_\_

- 1.13 Operator name and title: **Please see the attached list.**

- 1.14 Operator address and contact information: **Please see the attached list.**

- 1.15 Operator business organization type (check one): **Please see the attached list.**

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): **NON51802.**

2.2 Generation Unit Nameplate Capacity: **12 MW – The RE Growth Statute requires at least 12 MW (nameplate capacity) to be reserved for small scale solar projects. Therefore, the aggregation will be capped at 12 MW total. Should the Distributed Generation Board increase the capacity for small scale solar, the Company would seek an increase in the aggregation size accordingly.**

**The Company will provide quarterly updates of the projects added in the aggregation as the program continues.**

2.3 Maximum Demonstrated Capacity: **12 MW – see above.**

**The Company will provide quarterly updates of the projects added in the aggregation as the program continues.**

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: \_\_\_ \_\_\_ / \_\_\_ \_\_\_ / \_\_\_ \_\_\_ at the site.

**No projects under the aggregation have reached commercial operation to date. The Company will provide quarterly updates of the projects added in the aggregation as the program continues. This update will also include Commercial Operation Dates.**

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):

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**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):**

**Please see Appendix D and the attached Aggregation Agreement.**

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: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

**Please see the attached list. All units in the aggregation will be located in Rhode Island.**

A. Universal Transverse Mercator Coordinates: \_\_\_\_\_

B. Longitude/Latitude: \_\_\_\_\_ / \_\_\_\_\_

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

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.

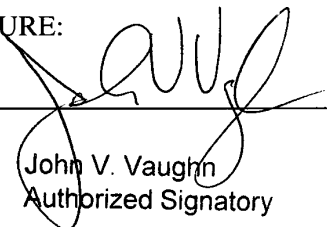

Appendix B completed and attached?

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:  DATE: 6/26/15  
  
Name: John V. Vaughn  
Title: Authorized Signatory

GIS Certification #:  
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**APPENDIX A**  
**(Required When Owner or Operator is An Individual)**  
**REPLACE WITH REC ASSIGNMENT FORM FOR EACH PROJECT**  
**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**

I, \_\_\_\_\_, as Owner or Operator of the Generation Unit named in Section 1.1 of the attached Renewable Energy Resources Eligibility Form, under the pains and penalties of perjury, hereby certify that \_\_\_\_\_, named in Section 1.8 of the attached Application, is authorized to execute this Renewable Energy Resource Eligibility Form.

SIGNATURE:

DATE:

\_\_\_\_\_  
\_\_\_\_\_  
(Title)

State: \_\_\_\_\_

County: \_\_\_\_\_

(TO BE COMPLETED BY NOTARY) I, \_\_\_\_\_ as a notary public, certify that I witnessed the signature of the above named \_\_\_\_\_, and said individual verified his/her identity to me on this date: \_\_\_\_\_.

SIGNATURE:

\_\_\_\_\_

My commission expires on: \_\_\_\_\_

NOTARY SEAL:



**RENEWABLE ENERGY GROWTH PROGRAM  
RENEWABLE ENERGY CERTIFICATE ASSIGNMENT AND AGGREGATION  
CERTIFICATION FORM**

**FOR SMALL-SCALE SOLAR PROJECTS ONLY**

The undersigned, certifies that he/she/it: (i) is the owner of the small-scale distributed generation solar system installed and located at \_\_\_\_\_ which enrolled in the Rhode Island Renewable Energy Growth Program on \_\_\_\_\_; (ii) authorizes National Grid to include his/her/its system as part of an aggregation in any state; (iii) assigns to National Grid all right and title to all renewable energy credits and certificates (“Certificates”) during the term of the Rhode Island Renewable Energy Growth Program Tariff (“Tariff”) and during the participation by the undersigned in the Rhode Island Renewable Energy Growth Program (the “Term”); (iv) authorizes National Grid, acting as a Non-NEPOOL Generator Representative, to represent the undersigned and the system in the New England Power Pool Generation Information System (“GIS”) and to receive all Certificates created in the GIS with respect to energy generated by every generating unit in the system during the Term; (v) acknowledges that he/she/it is obligated to and will notify National Grid promptly in the event of a change in the system’s eligibility status under the Tariff or under the Rhode Island Renewable Energy Standard; and (v) will notify the Massachusetts Department of Energy Resources and the Rhode Island Public Utilities Commission in writing within thirty (30) days upon the expiration of the Term.

The undersigned, National Grid, certifies: (i) that it has enrolled in the Rhode Island Renewable Energy Growth Program on \_\_\_\_\_ to include the small-scale distributed generation solar system located at \_\_\_\_\_ in an aggregation; and (ii) that it will notify the Massachusetts Department of Energy





Resources and the Rhode Island Public Utilities Commission in writing within thirty (30) days upon the expiration of the Term.

Signature of Generation Unit Owner: \_\_\_\_\_ Date \_\_\_\_\_

Signature of National Grid: \_\_\_\_\_ Date \_\_\_\_\_

GIS Certification #:

NON51802

**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.

**Please see the attached list. As required by the Rhode Island Renewable Energy Growth (the RE Growth) Program, all small-scale projects, which are all solar photovoltaic electricity generating facilities with a nameplate capacity up to and including 25 kW, will be located in Rhode Island and will be interconnected to the electric distribution system of The Narragansett Electric Company ("National Grid" or "Company"). All generation units will be interconnected and metered to measure the full output of the project.**

- 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.<sup>2</sup>

(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;<sup>3</sup>
- (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

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<sup>2</sup> 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.

<sup>3</sup> 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.

applicable to Third-Party Meter Readers, and to which the Aggregation Owner shall not have access<sup>4</sup>.

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)

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- (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)

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- (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)

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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 acknowledge this requirement  
 N/A or other (please explain)

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### Aggregation Agreement

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<sup>4</sup> 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.

## Rhode Island Renewable Energy Growth Program

- (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;

**As required by the Rhode Island Renewable Energy Growth (the RE Growth) Program, The Company and its affiliates, as applicable, will administer the program and the Company will possess the rights and title to the Renewable Energy Certificates (RECs) and any other environmental attributes or market products associated with the generation output of the aggregated projects.**

**Kris Hornberger**  
**Senior Trader**  
**Wholesale Electric Supply**  
**100 East Old Country Road**  
**Hicksville, New York 11801**  
**kris.hornberger@nationalgrid.com**  
**516-545-4563**

- (b) Name, contact information, and qualifications of the Verifier

**Michael Murphy**  
**Manager, ISO Meter Data Services**  
**300 Erie Boulevard West**  
**Syracuse, New York 13202**  
**michael.murphy@nationalgrid.com**  
**315-428-5421**

**The Company is the incumbent electric distribution company and metering authority for which such metering and data collection is already a core competency. The RE Growth Tariff requires all projects in this aggregation to have a company-owned meter for the purposes of measuring the output of the project. The Company and its affiliates, as applicable, will have adequate access to read the meters and to install, repair, maintain, and replace the meters.**

- (c) Any and all business or financial relations between Aggregator Owner and Verifier.

**The Company, in accord with the RE Growth Program, will serve as both Aggregator Owner and Verifier. Neither the Company nor any of its affiliates will possess, directly or indirectly, any equity ownership or voting interest in any of the aggregated projects, and no officer, director, employee or representative of the Company or its affiliates will simultaneously be an officer, director, partner, employee or representative of any of the aggregated projects. To the extent the Company and / or any of its affiliates obtained any such interest in a Generation**

**Unit, it would not be considered sufficiently independent and such Generation Unit would not be allowed to participate in the aggregation.**

**Pursuant to the Narragansett Electric Company Renewable Energy Growth Program for Residential Customers Tariff (the Tariff), the Company possesses the rights and title to the RECs and any other environmental attributes or market products associated with the generation output of the aggregated projects. In compliance with the RI RE Growth Statute, the Company will sell the RECs obtained from these projects and credit the proceeds to distribution customers in rates.**

**Section 3.33 of the Rhode Island Rules and Regulations Governing the Implementation of a Renewable Energy Standard (RI RES Rules) provides that “[a] Verifier may be the local electric distribution company.”**

**In compliance with RI RES sections 6.8(ii) and 6.8(iii)(b),(c),(e) and (g); and pursuant to the New England Power Pool Generation Information System (NEPOOL GIS) Operating Rules, Rule 2.5(j), the Company is seeking herein certification as a Verifier from the Commission. It is acknowledged that as part of its role as Verifier, the Company will coordinate with and use the services of its affiliates for purposes of meter reading and NEPOOL GIS reporting.**

- (d) Type of technology that will be included in the aggregation and statement

**In keeping with the RE Growth Statute (RI Gen. L. § 39-26.6) and the RE Growth Program Solicitation and Enrollment Process Rules for Small-Scale Solar Projects, all projects in this aggregation will be solar projects located in Rhode Island, with a nameplate capacity equal to or less than 25kW, and that will interconnect with the National Grid electric distribution system. None of the projects will have begun operation before June 15, 2015.**

- (e) Proposed operating procedure for the generation

**As part of the administration of RE Growth Program, the Company will determine that the Generation Units are in compliance with the Renewable Energy Standard regulations as required by the RE Growth Statute. In its role as Verifier, the Company, in coordination with its affiliates, as applicable, will verify that the NEPOOL GIS Certificates created accurately represent generation; and that the solar generation units exist.**

- (f) Description of Verifier compensation

**None. In its role as Verifier, the Company will not be compensated in a manner linked to the number of NEPOOL GIS Certificates created by the aggregation.**

(g) Confirmation and description of the Verifier to directly enter into the NEPOOL GIS

**In its role as Verifier, the Company, in coordination with its affiliates as applicable, will provide the meter data on a quarterly basis directly to the NEPOOL GIS Administrator via a secure internet portal / 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 will not have access.**

ILLUSTRATIVE EXAMPLE

<b>Color Key:</b> Project awarded Certificate of Eligibility and operational
Project awarded Certificate of Eligibility and not operational
Project removed from Renewable Energy Growth Program

Identification of the Generation Unit				Generation Unit Owner			
Generation Unit/Aggregation Name	NEPOOL GIS Generation Unit Asset ID#	NEPOOL GIS Account Plant-Unit Name	NEPOOL GIS Account Holder	Owner First Name	Owner Last Name	Owner Company	Owner Business Organization Type: Individual/Partnership/Corporation/Other (Specify)
RE Growth Small-Scale Solar Projects	NON12345	RE Growth Small-Scale Solar Projects	National Grid	Brett	Brewer	ABC Solar LLP	Partnership
RE Growth Small-Scale Solar Projects	NON12345	RE Growth Small-Scale Solar Projects	National Grid	Gustavo	Gibson	Not Applicable; resident	Individual
RE Growth Small-Scale Solar Projects	NON12345	RE Growth Small-Scale Solar Projects	National Grid	Harvey	Schwartz	XYZ Solar LLC	Other - Joint Venture
RE Growth Small-Scale Solar Projects	NON12345	RE Growth Small-Scale Solar Projects	National Grid	Shari	Simpson	Shell International B.V.	Corporation
RE Growth Small-Scale Solar Projects	NON12345	RE Growth Small-Scale Solar Projects	National Grid	Herbert	Dennis	Not Applicable; resident	Individual
RE Growth Small-Scale Solar Projects	NON12345	RE Growth Small-Scale Solar Projects	National Grid	Bob	Smith	123 Solar LLC	Individual



**EXAMPLE UPDATE REPORT - FOR ILLUSTRATIVE PURPOSES ONLY**

System Location Information				System Equipment Information					
Address	City	State	Zip Code	PV Module Manufacturer	PV Module Model	Number of PV Modules	Inverter Manufacturer	Inverter Model	Number of Inverters
4960 Rock Way	Smithfield	RI	02917	Yingli	ABC123	22	ABB	A1000	6
12 Beaver Street	Providence	RI	02902	Sharp	DEF456	11	Schneider Electric	B2000	3
200 Anfield Road	Warwick	RI	02887	First Solar	GHI789	16	Eaton	C3000	5
50 Roger Road	Pawtucket	RI	02860	Mitsubishi	JKL987	27	Solectria Renewables	D4000	8
2852 Smith Street	North Kingstown	RI	02852	Jinko Solar	MNO654	5	Fronius	E5000	2
50 Straight Road	Warwick	RI	02887	First Solar	GHI789	16	Eaton	C3000	5

**EXAMPLE UPDATE REPORT - FOR ILLUSTRATIVE PURPOSES ONLY**

Other System Details			
Date Issued Certificate of Eligibility	Commercial Operation Date	Nameplate Capacity (kW)	Independent Verifier
6/19/2015	6/22/2015	20	National Grid
6/26/2015	6/30/2015	10	National Grid
6/25/2015	6/29/2015	15	National Grid
6/24/2015	Not Operational	25	National Grid
6/22/2015	Not Operational	5	National Grid
6/20/2015	Removed from program	15	National Grid