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October 16, 2015

Via Electronic and Regular Mail

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

Re: Copenhagen Wind Farm – Docket No. 4574

Dear Ms. Massaro:

Enclosed for filing on behalf of Copenhagen Wind Farm, LLC in the above-referenced matter are an original and nine copies of the following:

- Responses to the Commission's First Set of Data Requests, issued October 5, 2015

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Gerald J. Petros" followed by a small "cw" in the bottom right corner.

Gerald J. Petros

GJP:cw

Enclosures

cc: RIPUC Service List (electronically only)

54631656 (71618.166315)

Docket No. 4574 - National Grid – Review of PPA - Copenhagen Wind Farm, LLC
Service List updated 9/2/15

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Copenhagen Wind Farm, LLC
Public Utilities Commission Docket No. 4574
In Re: Review of Purchase Power Agreement Between Narragansett Electric
Company d/b/a National Grid and Copenhagen Wind Farm, LLC
Responses to the Commission's First Set of Data Requests
Issued October 5, 2015

COMM 1-1

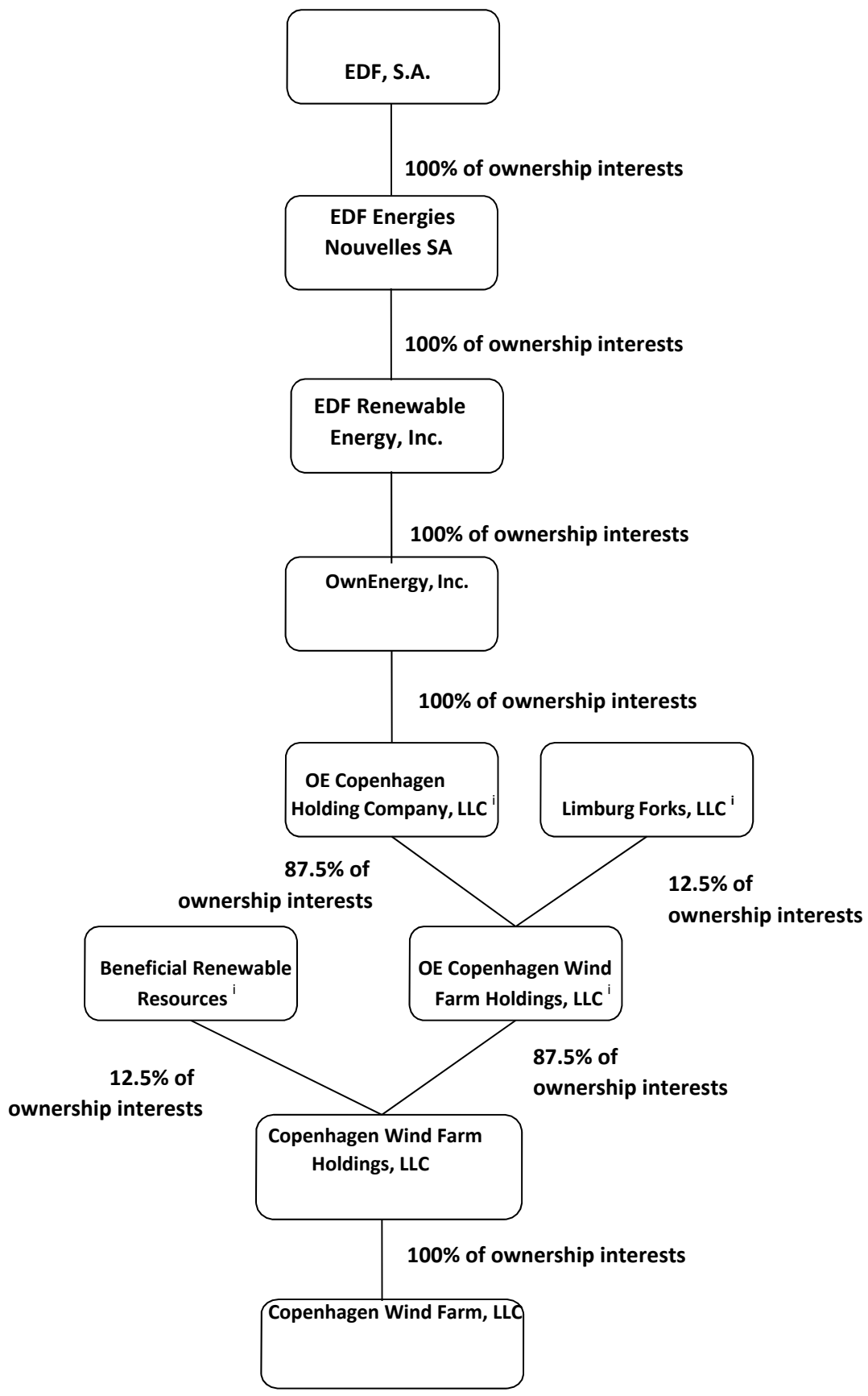
Request:

Beginning on Page 6, line 14 and ending on Page 7, line 9 of Mr. Crowell's direct testimony is an explanation of the corporate structure of the entities involved in the Copenhagen Wind Farm. Please provide this organizational structure in chart form.

Response:

Please see Attachment 1-1.

Copenhagen Wind Farm Organizational Chart



ⁱ For joint ventures between a local partner entity and OwnEnergy or one of its subsidiaries, the ownership percentages illustrate the maximum possible percentage the local partner may own if all the equity-based milestone incentives are reached, which may in many cases exceed their current ownership percentages. Please check with in-house counsel for exact ownership percentages if necessary.

COMM 1-2, Page 1 of 2

Request:

Page 8, beginning on line 4 of Mr. Marchand's direct testimony is an explanation of the chain of transactions in which the energy output of the project is sold, repurchased and sold again and exported. Please identify the buyer and seller at each individual transaction.

Response:

The output from the Copenhagen Wind Project will be scheduled through NYISO's Joint Energy Scheduling System (JESS) as a bilateral export transaction from the Copenhagen node into ISO-NE. An additional transaction – an internal bilateral transaction which will be scheduled on the ISO-NE side -will further move the output to the buyer, Narragansett Electric.

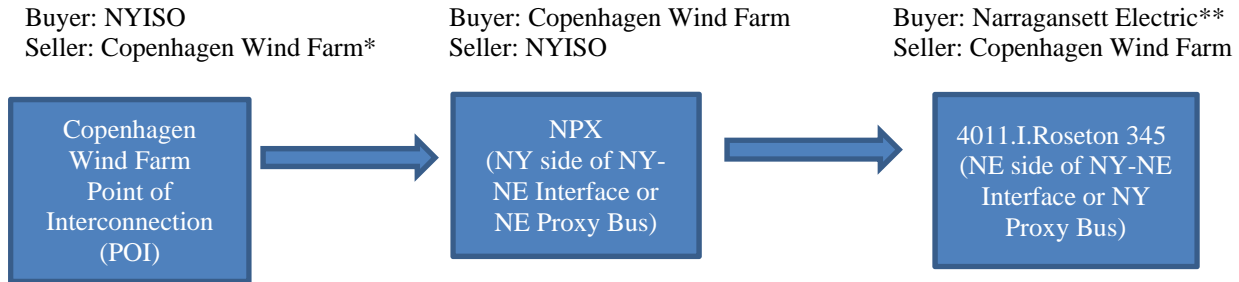
On the NYISO side, the export of power from Copenhagen is actually associated with two transactions: (1) internal, whereby Copenhagen output is sold at the project node to NYISO and (2) external, whereby the output is being exported into ISO-NE from the project node with project paying a transmission usage charge to NYISO.

Copenhagen will be subject, as all external transactions on the NY-NE Northern interface, to NYISO/ISO-NE jointly coordinated procedures which, among others, require all external bids to be submitted at least 75 minutes prior to the operating hour.

Because the JESS scheduling requirements call for delivery schedules to be supplied 75 minutes in advance and the wind project's output is intermittent, and because Narragansett Electric may only receive the lesser of metered output or scheduled, there will be some residual balancing trades done to match the bilateral export transaction to the Project's output. Those residual trades will be done with the NYISO. The residual balancing trades will be shown as internal sales at the project node to NYISO (when the metered output is higher than export schedule) or as export sales at Roseton node to ISO-NE (when the export schedule is higher than the metered output of the project).

COMM 1-2, Page 2 of 2

A simplified chart of the different steps to move power from project node to buyer is shown below.



*The metered output in excess of the export schedule will be sold into the NYISO market.

**Energy scheduled for delivery at Roseton in excess of the actual metered output of the wind farm will be sold into the ISO-NE market and not sold to Narragansett Electric under the PPA. Delivered energy that is sold to Narragansett Electric is credited to Narragansett Electric in the ISO-NE settlement system.

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COMM 1-3

Request:

Please provide a Gantt (or similar) chart illustrating the project timeline.

Response:

Please see Attachment 1-3.

Date / Target Date	Milestones
October, 2015	Initial PPA Security required
October, 2015	30% road and layout engineering design complete
December, 2015	Facility Study (Part 1 of Class Year 2015) Complete
January, 2016	Execute Cost Reimbursement Agreement for Nat Grid
April, 2016	Execute Turbine Supply Agreement
April, 2016	Execute EPC Agreement (LNTP Design & Long Lead)
July, 2016	Execute LGIA
October 1, 2016	Mobilize to Site
Nov-Dec, 2016	Clear Trees
April, 2017	Transmission Interconnection Facilities in-service date
May - Sept, 2017	Road, Collection System, Gen-Tie, Substation(s) and Foundation
June, 2017	Start of Turbine Deliveries and Turbine Erection
August, 2017	Complete WTG Deliveries
July-Sept, 2017	WTG Erection and Mechanical Completion
September, 2017	WTG Testing & Commissioning Completion
September, 2017	SCADA Testing & Commissioning Completion
October, 2017	Commercial Operations Achieved (PTC Qualification)

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COMM 1-4

Request:

Robert Crowell at 4, line 12. Mr. Crowell states that the ITP is not required for construction or operation. To clarify, please confirm whether or not Copenhagen Wind Farm is required by law to obtain an ITP at any stage of development, pre- or post-construction/operation.

Response:

The Copenhagen Wind Farm is not required by law to obtain an ITP at any stage of development, pre- or post-construction/operation.

COMM 1-5

Request:

Robert Crowell at 4, lines 15-18. If Copenhagen Wind Farm is not legally required to obtain an ITP, why is it seeking a technical assistance letter? If the technical assistance letter is referenced in the PPA, provide the citation.

Response:

Copenhagen Wind Farm, LLC ("Copenhagen") is seeking a technical assistance letter ("TAL") to avoid potential liability. If Copenhagen does not obtain an Incidental Take Permit ("ITP") from the United States Fish and Wildlife Service ("FWS"), then Copenhagen could face prosecution under the Endangered Species Act ("ESA") if the wind farm results in the death of a protected species, such as certain protected bats. This risk is not acceptable to Copenhagen. Consequently, Copenhagen is pursuing an ITP.

Obtaining the TAL is a bridge strategy. The TAL establishes construction and operation parameters whereby it is not possible in the eyes of the FWS that the project will take a protected species. With a TAL, Copenhagen can obtain other federal permits, construct the wind farm, and (if necessary) operate before obtaining the ITP and without the risk of potential liability under the ESA.

The TAL is not expressly referenced in the PPA.