

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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| IN RE: WIND ENERGY DEVELOPMENT’S | : | |
| APPLICATION FOR CERTIFICATION OF WED | : | DOCKET NO. 4649 |
| COVENTRY FIVE AND COVENTRY SIX, LLC | : | |
| AS A RENEWABLE ENERGY RESOURCE | : | |
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| TOWN OF WEST WARWICK’S APPLICATION FOR | : | DOCKET NO. 4645 |
| CERTIFICATION OF WED COVENTRY TWO, LLC | : | |
| AS A RENEWABLE ENERGY RESOURCE | : | |
| | | |
| NARRAGANSETT BAY COMMISSION’S | : | |
| APPLICATION FOR CERTIFICATION OF | : | DOCKET NOS. 4650 & 4662 |
| COVENTRY 1, COVENTRY 3, AND COVENTRY | : | |
| 4 AS A RENEWABLE ENERGY RESOURCE | : | |

REPORT AND ORDER

I. Introduction and Eligibility

This order combines four applications from three applicants seeking certification from the Public Utilities Commission (PUC or Commission) for ten wind turbines located in Coventry, Rhode Island as an eligible New Renewable Energy Resource in accordance with the PUC’s Rules and Regulations Governing the Implementation of a Renewable Energy Standard (RES Rules). The three applicants, Wind Energy Development, LLC (WED), Town of West Warwick (West Warwick), and Narragansett Bay Commission (NBC), each own a portion of a cluster of ten wind turbines totaling 15 MW of nameplate capacity. WED owns four turbines totaling 6 MW; West Warwick owns three turbines totaling 4.5 MW; and NBC owns three turbines totaling 4.5 MW. All the turbines are located on the same or adjacent properties in Coventry, Rhode Island and are currently considered by ISO-NE to be interconnected behind a single market settlement system (MSS) meter.

At an Open Meeting conducted on December 20, 2016, the PUC approved all of the applications as New Renewable Energy Resources. Each individual unit behind the MSS meets

the definition of a New Renewable Energy Resource and, thus, the entire cluster measured at the MSS is qualified as a New Renewable Energy Resource for purposes of the Renewable Energy Standard. The PUC approved the applications of West Warwick and NBC as New Renewable Energy Resources. The PUC also approved the application of WED Coventry Six, LLC, a 4.5 MW resource, as a New Renewable Energy Resource with the requirement that WED provide the PUC with the date that Coventry Five, LLC (1.5 MW) achieves commercial operation. At that time, WED Coventry Six, LLC will be updated to a 6.0 MW resource comprising the WED Coventry Five, LLC and WED Coventry Six, LLC turbines.¹

II. Measuring and Accounting for RECs

Determining how to certify the units within this configuration was an issue of first impression for the Commission. As a result, discovery ensued in the form of data requests, and conversations (both on the phone and in person) between Commission staff, its consultant, ISO-NE, the NE-GIS administrator, WED, West Warwick, NBC, and National Grid. One issue that arose was how to properly measure and account for the energy and Renewable Energy Certificates (RECs) from each individual unit given that the NEPOOL GIS will only be accounting for those read by the MSS.

Because the turbines are all behind one MSS meter, the energy and RECs from each will be accounted for in the same account in the NEPOOL GIS. However, because the turbines are either all owned by the same entity nor all enrolled in the same state program -- some are net metering and some are enrolled in the Renewable Energy Growth program -- the RECs cannot be considered as customer sited for purposes of the NEPOOL GIS. Therefore, none of the unite can be designated as a Non-NEPOOL Generator (NON) with a verifier submitting the REC count to

¹ More specific information relevant to each application is addressed in parts four through six of this order, below.

the NEPOOL GIS. Rather, all of the units will be counted at the single MSS and will need to be manually reallocated out of the main account to accounts set up by National Grid, West Warwick, and NBC.

Reallocating the RECs will require the development of a disaggregation procedure between WED (the lead market participant), West Warwick, NBC, and National Grid. This is necessary to clearly determine how much energy and RECs are generated from each wind turbine so the RECs can be clearly tracked, used and/or traded by each entity. It is imperative that the disaggregation plan be clear as to how the tracking and verification will work in order to ensure appropriate allocation of RECs to the proper owners and to avoid double counting. The PUC's consultant recommended that RECs be assigned by their serial numbers to each owner and that reporting the serial number assignments be a reporting requirement of the applicants. If this approach is not accepted, the disaggregation plan should include some proposal that achieves the purpose as effectively as the consultant's proposal. Without an adequate plan in place prior to the minting period that occurs on January 10, 2017, this configuration will be ripe for dispute going forward and the PUC will have a difficult time performing its functions associated with the Renewable Energy Standard.

National Grid, WED, West Warwick, and NBC shall file for review with the PUC, no later than January 5, 2017, a disaggregation plan setting forth the measurement method for verifying energy generated by each owner's generation unit. The plan should clearly set forth: how the tracking of each owner's generation units will occur; how portions of MWHs (or RECs) will be allocated to owners; and how the tracking of the sale and ownership transfers of all of the RECs associated with the aggregation will occur in order to avoid double counting.

III. Remodeling of generation

The cluster of units was originally modeled by ISO-NE as a single generation unit with a single Asset Identification number. ISO-NE has confirmed that the generator can now be modeled with three separate and distinct ISO-NE Asset ID numbers and associated GIS MSS Asset ID numbers. This will allow for an accurate and verifiable accounting of the energy and RECs associated with each unit owner's combined turbines in the NEPOOL-GIS. It will also avoid double counting of RECs, a concern where the units are certified as eligible for other states' renewable portfolio standards.

The applicants shall work with National Grid, ISO-NE, and the GIS Administrators during quarters one and two of 2017 to replace the single Asset Identification number with three separate and distinct ISO-NE Asset ID numbers and associated GIS MSS Asset ID numbers in time for inclusion within ISO-NE's Quarter two 2017 Power System Model Release. Once the new Asset ID numbers and associated GIS MSS Asset ID numbers have been assigned, each applicant shall notify the PUC so that the PUC may assign each applicant (and their respective collective units) a unique certification number.

IV. WED Coventry Six, LLC – WED Coventry Six, LLC & WED Coventry Five, LLC

On September 23, 2016 and December 13, 2016, WED Coventry Six, LLC² filed with the PUC two applications seeking certification for its WED Coventry Six and WED Coventry Five, a combined 6.0 MW wind energy facility comprising four 1.5 MW units located in Coventry, Rhode Island, as an eligible New Renewable Energy Resource in accordance with the PUC's RES Rules and R.I. Gen. Laws § 39-26-1. WED Coventry Five, a 1.5 MW wind energy facility, has not yet

² The authorized representative was identified as Mark DePasquale, Sole Member, 3760 Quaker Lane, North Kingstown, RI 02852; Phone: (401) 295-4998, Fax: (401) 295-4944, Email: Md@wedenergy.com.

achieved commercial operation. Once it does, WED Coventry Six, LLC is required to so advise the PUC. Because all of the units are located behind one MSS, and WED Coventry Six achieved commercial operation on July 15, 2016, the PUC is treating the addition of WED Coventry Five as an expansion of WED Coventry Six and not as a separate application. Pursuant to Section 6.0 and other relevant Sections of the RES Rules, a thirty-day period for public comment was provided during which time no such comments were received.

After examination of the application and supplemental information, discussed above, the PUC is of the opinion that the application, including said supplemental information, is proper, reasonable, and in compliance with the RES Rules, and hereby grants WED Coventry Six, LLC certification as an eligible renewable energy resource pursuant to R. I. Gen. Laws § 39-26-1. The PUC's determination in this docket is based on the information submitted by WED Coventry Six, LLC and the PUC may reverse its ruling or revoke the certification if any material information provided by WED Coventry Six, LLC proves to be false or misleading.

V. Town of West Warwick – WED Coventry Two, LLC

On August 25, 2016, West Warwick³ filed with the PUC an application seeking certification for WED Coventry Two, LLC, a combined 4.5 MW wind energy facility comprising of three 1.5 MW units located in Coventry, Rhode Island, as an eligible New Renewable Energy Resource in accordance with the RES Rules and R.I. Gen. Laws § 39-26-1. Pursuant to Section 6.0 and other relevant Sections of the RES Rules, a thirty-day period for public comment was provided, during which time no such comments were received.

After examination of the application and supplemental information, discussed above, the PUC is of the opinion that the application, including said supplemental information, is proper,

³ The authorized representative was identified as Frederick Presley, Town Manager, 1170 Main Street, West Warwick, RI 02893; Phone: (401) 822-9219, Email: fpresley@westwarwickri.org.

reasonable, and in compliance with the RES Rules, and hereby grants the Town of West Warwick certification as an eligible renewable energy resource pursuant to R. I. Gen. Laws § 39-26-1. The PUC's determination in this docket is based on the information submitted by West Warwick and the PUC may reverse its ruling or revoke the certification if any material information provided by the West Warwick proves to be false or misleading.

VI. Narragansett Bay Commission – Coventry 1, Coventry 3, & Coventry 4

On September 26, 2016 and October 24, 2016, NBC⁴ filed with the PUC two applications seeking certification for Coventry 3 and Coventry 4 in the first and Coventry 1 in the second for a combined 4.5 MW wind energy facility comprising three 1.5 MW units located in Coventry, Rhode Island, as an eligible New Renewable Energy Resource in accordance with the RES Rules and R.I. Gen. Laws § 39-26-1. Pursuant to Section 6.0 and other relevant Sections of the RES Rules, a thirty day period for public comment was provided during which time, no such comments were received.

After examination of the application and supplemental information, discussed above, the PUC is of the opinion that the application, including said supplemental information is proper, reasonable, and in compliance with the RES Rules, and hereby grants NBC certification as an eligible renewable energy resource pursuant to R. I. Gen. Laws § 39-26-1. The PUC's determination in this docket is based on the information submitted by NBC and the PUC may reverse its ruling or revoke the certification if any material information provided by the NBC proves to be false or misleading.

⁴ The authorized representative was identified as Raymond Marshall, Executive Director, One Service Road, Providence, RI 02905; Phone: (401) 461-8848, Email: rmarshall@narrabay.com.

Accordingly, it is

(22643) ORDERED:

1. WED Coventry Two, LLC, WED Coventry Five, LLC, WED Coventry Six, LLC, Coventry 1, Coventry 3, and Coventry 4 together and separately meet the requirements for eligibility as a New, Wind Renewable Energy Resource.
2. WED Coventry Two, LLC is found to have a Commercial Operation Date of August 5, 2016 and located within the NEPOOL control area in Coventry, Rhode Island.
3. WED Coventry Six, LLC is found to have a Commercial Operation Date of July 15, 2016 and located within the NEPOOL control area in Coventry, Rhode Island.
4. WED Coventry Five, LLC is found to not yet have a Commercial Operation Date but is located within the NEPOOL control area in Coventry, Rhode Island. WED Coventry Six, LLC shall advise the Public Utilities Commission upon achievement of Commercial Operation of WED Coventry Five, LLC.
5. Coventry 1, Coventry 3, and Coventry 4, collectively, is found to have a Commercial Operation Date of August 6, 2016 and located within the NEPOOL control area in Coventry, Rhode Island.
6. The ten generating units: WED Coventry Two, LLC; WED Coventry Five, LLC; WED Coventry Six, LLC; Coventry 1; Coventry 3; and Coventry 4 are all associated with MSS 86004.
7. The entire 15 MW facility comprising WED Coventry Two, LLC; WED Coventry Five, LLC; WED Coventry Six, LLC; Coventry 1; Coventry 3; and Coventry 4 is initially assigned unique certification number RI-4649-N16.

8. The entire 15 MW facility's RECs become Rhode Island-eligible effective on the first day which the Rhode Island certification number is issued. All RECs associated with the production of eligible energy that are minted on or after the Effective Date are eligible for the RES.
9. On or before January 5, 2017, WED Coventry Six, LLC; the Town of West Warwick; and the Narragansett Bay Commission shall file with the Public Utilities Commission a disaggregation plan setting forth the measurement method for verifying energy generated by each owner's generation unit. The plan should clearly set forth: how the tracking of each owner's generation units will occur; how portions of MWHs (or RECs) will be allocated to owners; and how the tracking of the sale and ownership transfers of all of the RECs associated with the aggregation will occur in order to avoid double counting.
10. WED Coventry Six, LLC; the Town of West Warwick; and the Narragansett Bay Commission shall work with National Grid, ISO-NE, and the GIS Administrators during quarters one and two of 2017 to replace the single Asset Identification number with three separate and distinct ISO-NE Asset ID numbers and associated GIS MSS Asset ID numbers in time for inclusion within ISO-NE's Quarter two 2017 Power System Model Release. Once the new Asset ID numbers and associated GIS MSS Asset ID numbers have been assigned, each applicant shall notify the PUC so that the PUC may assign each applicant (and their respective collective units) a unique certification number.
11. Although the PUC will rely upon the NEPOOL GIS for verification of production of energy from the generation units certified as eligible in this Order, WED Coventry Six,

LLC, the Town of West Warwick, and the Narragansett Bay Commission will provide information and access as necessary to the PUC, or persons acting at its behest, to conduct audits or site visits to assist in verification of continued eligibility for and compliance with RI RES Certification at any time at the PUC's discretion.

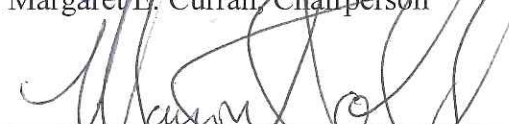
12. WED Coventry Six, LLC; the Town of West Warwick; and/or Narragansett Bay Commission shall notify the PUC in the event of a change in any of its facilities' eligibility status.


EFFECTIVE AT WARWICK, RHODE ISLAND ON DECEMBER 20, 2016
PURSUANT TO AN OPEN MEETING DECISION. WRITTEN ORDER ISSUED
DECEMBER 30, 2016.

PUBLIC UTILITIES COMMISSION




Margaret E. Curran, Chairperson


Marion S. Gold, Commissioner


Herbert F. DeSimone, Commissioner

NOTICE OF RIGHT OF APPEAL: Pursuant to R.I. Gen. Laws § 39-5-1, any person aggrieved by a decision or order of the PUC may, within seven days (7) from the date of the order, petition the Supreme Court for a Writ of Certiorari to review the legality and reasonableness of the decision or order.