

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.

The generation unit is connected behind the electric utility meter of the Narragansett Bay Commission's Bucklin Point Wastewater Treatment Facility located at 102 Campbell Avenue in Rumford, RI where it provides a portion of the electricity consumed by the facility. The latitude of the unit is 41 degrees, 51 minutes and 4 seconds north. The Longitude of the unit is 71 degrees, 21 minutes and 59 seconds west. The unit is owned by the Narragansett Bay Commission and the system is designed to avoid exportation of electricity onto the local utility owned electric power distribution grid.

- 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.¹

(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;²
- (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 access³.

¹ 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.

² 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.

³ 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

X 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

X 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

X 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

X N/A or other (please explain) _____

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

Part D.2

(a) Name and Contact Information of Owner:

Thomas Uva, Director of Planning, Policy and Regulation
One Service Road, Providence, RI, 02905
Phone:401-461-8848 x470
Email: tuva@narrabay.com

(b) Name, contact info, and qualifications of the Verifier:

DimitriKordonis
Senior Consultant

Daymark Energy Advisors
370 Main street Ste. 325
Worcester, MA 01608

Main: (617) 778-5515 | Dir: (617) 778-2430
dkordonis@daymarkea.com

Daymark Energy Advisors (formerly known as La Capra Associates) is currently registered as an Independent Verifier in the NEPOOL GIS system (ID 14650). Daymark was accepted on July 12, 2010 as an Independent Verifier by the Massachusetts Department of Energy Resources. Daymark has provided similar services for hydro, LFG, and solar facilities in Massachusetts, Rhode Island, and Vermont.

Please see attached the resume of Dimitri Kordonis.

(c) Statement of relations between Owner and Verifier:

Daymark is a full-service, independent employee-owned energy consulting firm. Daymark has been in the energy business for over 30 years. Daymark does not have any ownership stake in the Bucklin Point Wastewater Treatment Facility project associated with Narragansett Bay Commission (NBC). Daymark has neither stock nor equity interests in the Bucklin Point Wastewater Treatment Facility. In addition, NBC has no ownership or equity interest in Daymark. Both companies/entities are independent of one another.

(d) Technology Type:

This is an eligible Biomass facility that is using Eligible Biomass Fuel. Fuel will be gas resulting from anaerobic digesting of wastewater.

(e) Proposed operating procedures for the aggregation:

N/A

(f) Description of Verifier compensation:

Daymark is contracted by NBC to provide Independent Third Party Meter Reader services, and is compensated for its services to verify and read the meter at the Bucklin Point Wastewater Treatment Facility and to enter metering data into the NEPOOL GIS system. Compensation includes costs for Daymark, time to inspect the meters and conduct periodic meter reads, perform data validation, and enter data into the NEPOOL GIS.

(g) Confirmation and Description of production entry:

As the Verifier, Daymark will enter the production data on a monthly basis from the appropriate meter for the Bucklin Point Wastewater Treatment Facility.



Dimitri Kordonis

Senior Consultant

Dimitri Kordonis has experience in market operations, financial and power system analyses, and project management. He works with clients on matters including transmission planning, energy markets operations and procurement, renewable energy system integration and economics, market analytics, and stakeholder support. Prior to joining Daymark Energy Advisors, Mr. Kordonis worked six years for ISO New England in the market operations department, where he was responsible for power system analyses, Day-Ahead Market, Financial Transmission Right, and Forward Reserve Market administration.

SELECTED PROFESSIONAL EXPERIENCE

Market modeling and Market design

- Advises the New York State Utility Intervention Unit (NY UIU) regarding the design of New York ISO's energy, ancillary service and capacity market structures and the coordination of gas-electric infrastructure and market issues in New York. (2015-present)
- Assisted in preparing expert testimony to the FERC on behalf of generation suppliers in New England providing analysis, critique, and recommended revisions on proposed changes to the ISO-NE Tariff provisions regarding capacity market design and mitigation rules.
- Responsible for developing models and methods for integrated supply and demand-side resource analysis. Developed and performed an analysis of the ISO-NE, PJM and MISO capacity markets under uncertainty using Monte Carlo techniques.
- Forecasted capacity market prices (in New England, New York, and PJM) for use in project evaluation and impacts on retail rates. Included discussion of bidding strategies for generators given different projections for auction clearing prices. Forecast work included determination of future implementation levels of energy efficiency and other demand-side resources as capacity resources.
- Assisted in various enhancements to ISO-NE's simultaneous feasibility test (SFT) and Scheduling, Pricing and Dispatch (SPD), that included introduction of the Combined Cycle generators, Wind assets and Demand Response in the Day Ahead and Real Time Markets.

Transmission/Planning

- Performed short term load flow transmission studies to assess system reliability to support NEPOOL and ISO-NE requests.
- Performed daily economic impact analysis of short term transmission outages to minimize economic impact in accordance with the ISO's market rules and operating procedures.
- Supported and assisted in special studies to determine reliable operating limits for internal and external interfaces to ISO-NE.
- Assessed technical thermal analysis of transmission and generation outages focused on specific asset or transmission element.

- Implemented NERC CIP program and conducted NERC risk based methodology assessment for all Edison Mission Energy's critical assets and critical cyber assets.
- Evaluated Non Transmission Alternatives for major transmission enhancements to determine whether they met the region's reliability criteria and assessed their cost.
- Reviewed capital plans and cost recovery mechanisms for capital expenditures that included engineering review of construction budgets and system performance.

Procurement/Market Analytics

- Prepared projections of Locational Marginal Prices (LMP), Financial Transmission Rights/Congestion Revenue Rights (FTR/CRR) Clearing Prices, Reserve Market Clearing Prices and FCM Clearing Prices using market simulation tools and analyzed the results.
- Contributed subject matter expert content for published reports circulated by ISO-NE to Market Participants describing strategic market initiatives and potential issues.
- Identified new areas of enhancements to improve asset management in various de-regulated markets such as PJM, MISO and ERCOT.
- Contributed in the valuation of assets (Coal and Wind) that included financial modeling, forecasting, and market analysis.
- Assisted in evaluating and submitting bids to various markets in the US. This included bids for Day Ahead and Real Time markets, Reserve markets, Financial Transmission Rights and Capacity markets.

Due Diligence & Project Review

- Reviewed and evaluated generation projects submitted per PSEG Long Island 2015 RFP. Focused on conformance with technical requirements and expected technology reliability, cost and operational benefits.
- Established minimum qualifications for transmission developers for the Florida Reliability Coordinating Council. Evaluated multiple qualifications packages to determine consideration for the regional transmission bidding process per FERC Order 1000.
- Provided asset management services to private equity firms and generation developers. Advised on the state of the market in various RTOs/ISOs and discussed potential acquisition and development opportunities.

Renewable Energy

- Currently providing NEPOOL-GIS third-party verification services for NEPOOL-GIS for hydroelectric, landfill gas, solar, and wind facilities.
- Contributed to Wind integration at ISO-NE. This included market and operations enhancements in addition to market testing and operator training.
- Researched forward capacity market rules in New England regarding qualification requirements, auction administration, financial assurance, and resource availability adjustments as regards to renewable resources and other intermittent generators.
- Assisted in the valuation of new Wind assets in the MISO and ERCOT markets.
- Key contributor to Wind integration, demand response integration and Long Term Financial Transmission Rights integration efforts at ISO-NE.

- Implemented real time dispatch and curtailment logic at Edison Mission Energy's Big Sky (PJM Market) and Goat Wind (ERCOT) assets.

Stakeholder Process

- Involved as an active participant in the working groups refining the New York Independent System Operator, Inc. ("NYISO") market structure and developing methods to improve the market design, including all aspects of its energy, ancillary services and capacity markets.
- Assisted in presenting enhancements to the Financial Transmission Rights market at the ISO-NE's market committee.
- Conducted data analyses and evaluations to correctly implement proposed Market Rules for the Forward Reserve and Forward Capacity markets.
- Attended multiple ISO-NE Market Committee meetings as a subject matter expert and responded to market participant questions related to proposed market rule changes.

EMPLOYMENT HISTORY

Daymark Energy Advisors, Inc.	Boston, MA
<i>Senior Consultant</i>	Mar. 2017 – Present
<i>Consultant</i>	2013 – Feb. 2017
Edison Mission Marketing & Trading	Boston, MA
<i>Applications Analyst</i>	2012 – 2013
ISO New England, Inc.	Holyoke, MA
<i>Senior Market Operations Analyst</i>	2011 – 2012
<i>Market Operations Analyst</i>	2008 – 2011
<i>Associate Market Operations Analyst</i>	2007 – 2008

EDUCATION

University of Massachusetts	Amherst, MA
<i>Masters of Business Administration</i>	2011
Rutgers School of Engineering	New Brunswick, NJ
<i>M.S. Electrical and Computer Engineering</i>	2007
<i>B.S. Electrical and Computer Engineering</i>	2005
<i>Minor Degree in Economics</i>	2005
United States Navy	Norfolk, VA
<i>Gas System Engineering School</i>	2000

PRESENTATIONS

- *Challenges of Contingency Analysis in the Day and Real Time Markets* presented at the AREVA Winter Conference, Seattle, WA, 2009.
- *Unit Commitment and Dispatch- Wholesale Electricity Markets (WEM 201)* presented at ISO-NE Training facility, Northampton, MA, 2010.
- *Swiss RE conference NYC, Pay for Performance* presented at Swiss RE offices, New York City, NY, 2016

EXPERT TESTIMONY

<u>Forum</u>	<u>On Behalf of:</u>	<u>Topic</u>
State of Connecticut Public Utilities Regulatory Authority (Docket No. 15- 02-6)	Yale University	Expert testimony in regards to potential rate payer benefits as a result of the replacement of Yale's aging Central Cogeneration Power Plant. April 2015.
Federal Energy Regulatory Commission (Docket No. ER16-1404), May 2016	New York Utility Intervention Unit (NY UIU)	Affidavit regarding the revision of the buyer-side capacity market power mitigation measures ("BSM Rules") to exempt certain narrowly defined renewable and self-supply resources from Offer Floor mitigation
Federal Energy Regulatory Commission (Docket No. ER17-386-000), December 2016	New York Utility Intervention Unit (NY UIU)	Affidavit regarding the appropriate values for determining the NYISO Installed Capacity Demand Curves
State of Vermont Public Service Board (Docket No. 8847)	Green Mountain Power	Expert testimony regarding the engineering and economic impact of the Vermont Green Line – a 400 MW high voltage direct current (HVDC) electric transmission project – to Vermont and Green Power's assets