

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

IN RE: HEXAGON ENERGY, LLC)

Docket No. 5060

HEXAGON ENERGY, LLC'S
RESPONSE TO
DIVISION'S DATA REQUESTS (1ST SET)

(AUGUST 31, 2020)

- 1-1. Please provide the name and address of the legal owner(s) of the parcel or parcels of land which is/are the subject of the Petition.

RESPONSE:

Parcel 1 – Going Green Realty LLC, 1738 Tarkiln Rd, Harrisville, RI 02830

Parcel 2 – Montigny Enterprises Inc, 59 Main St, Albion, RI 02802

- 1-2. Please provide the Plat and Lot number of each parcel of land which is the subject of the Petition.

RESPONSE:

Parcel 1 – AP 113, Lot 11

Parcel 2 – AP 113, Lot 12

- 1-3. Please provide a Plat and Lot map of the properties which are the subject of the Petition.

RESPONSE: See Folder 1-3 for Burrillville Assessor Plat Map.

- 1-4. Please provide a detailed chronological narrative of the planning, design and execution of the two projects that are subject of the Petition from their inception to the present date.

RESPONSE: Below is an executive summary of the critical benchmarks and dates in the development of the two projects:

Parcel 1

July 22, 2020: National Grid, System Impact Study Complete

August 3, 2020: Burrillville Planning Board, Master Plan Approval

September 9, 2020: Burrillville Town Council, Rezoning Hearing

October 13, 2020 (pending): Burrillville Zoning Board, Special Use Permit Hearing

Parcel 2

September 30, 2019: National Grid, System Impact Study Complete

December 5, 2019: National Grid, Interconnection Service Agreement Complete

October 7, 2019: Burrillville Planning Board, Master Plan Approval

March 10, 2020: Burrillville Zoning Board, Special Use Permit Approval

- 1-5. Please provide any and all engineering, topo maps, and surveys describing the properties and facilities proposed to be developed which are the subject of the Petition.

RESPONSE: See Folder 1-5 for the most recent site plans and single line diagrams.

- 1-6. Please provide the “enrollment class” of each facility to be proposed on the properties which are the subject of the Petition, and also provide documentation that reflects the “enrollment class” of each facility.

RESPONSE:

Parcel 1 – Commercial-Scale Solar (251-999 kW DC) + Solar Carport Incentive

See Folder 1-6 for Supplemental Data Sheet submitted during REG enrollment

Parcel 2 – CRDG Commercial Solar (251-999 kW DC)

See Folder 1-6 for Certificate of Eligibility from REG

- 1-7. Please provide the “class nameplate range” of the enrollment class of each of the properties which are the subject of the Petition, and also provide documentation that reflects the “class nameplate range” of each facility.

RESPONSE:

Parcel 1 – Commercial-Scale Solar (251-999 kW DC) + Solar Carport Incentive

See Folder 1-6 for Supplemental Data Sheet submitted during REG enrollment

Parcel 2 – CRDG Commercial Solar (251-999 kW DC)

See Folder 1-6 for Certificate of Eligibility from REG

- 1-8. Please provide all correspondence (e-mails, regular mail, *etc.*) between the Petitioner and National Grid relating their discussions of the segmentation issue.

RESPONSE: See Folder 1-8 for all relevant correspondence.

- 1-9. Please provide all correspondence (e-mail, regular mail, *etc.*) between the Petitioner and OER and/or any other third party regarding the segmentation issue.

RESPONSE: See Folder 1-9 for relevant correspondence.

- 1-10. Please provide any “decision” or interpretation by National Grid regarding the segmentation issue.

RESPONSE: See “National Grid Letter and Comments on Hexagon Petition” submitted by Laura Bickel, Senior Counsel on August 31, 2020. This letter reflects National Grid’s position as stated over several phone calls that they were unable to award the project despite their belief that the project did not violate the intention of segmentation rules. Additionally, See Folder 1-10 for an email summarizing call between National Grid and Hexagon Energy with their original determination as described in National Grid’s 08/31/2020 letter.

- 1-11. Please identify the technology (*e.g.*, solar or wind) whether it is ground mount or rooftop and tracking or fixed of each proposed facility that is the subject matter of the petition.

RESPONSE:

Parcel 1 – Carport Solar

Parcel 2 – Ground-mount, fixed-tilt Solar

- 1-12. Please identify the production in MWhr’s (annually full year or monthly for partial years) for all years of operation of each facility that is the subject matter of the petition.

RESPONSE:

Parcel 1 – 1278 MWh/yr

Parcel 2 – 1,434 MWh/yr

Rhode Island Renewable Energy Growth Program – Supplemental Data Required

Due to unforeseen issues we were not able to get these questions inserted into the web-application process. These questions are required, for applying to the REGrowth 2020 Program Year, as guided by the Rhode Island Distributed Generation Board. **Complete this form in its entirety and save keeping the naming convention provided. Please e-mail back to RenewableContracts@nationalgrid.com.**

General Information	
Project Owner:	Semi Stream Solar LLC
Project Name:	Semi Stream Solar
Renewable Energy Class:	Commercial-Scale Solar (251-999 kW DC)
Nameplate Capacity:	998 kW
Authorized Representative:	Daniel Bulka
E-mail Address:	dbulka@hexagon-energy.com; bbecker@hexagon-energy.com
Telephone Number:	(434) 260-8730
InterconnectionID or Case#:	243294
Submittal Time:	7/24/20 12:11 AM

Solar Carport Projects

Note: A Customer whose DG Project includes nameplate capacity that meets the definition as a Solar Carport will be eligible for the Solar Carport Incentive specified in the applicable Tariff supplement and will be included in the Performance Based Incentive amount for the specific DG Project. (The 2020 Program Year Solar Carport Incentive is 6.0 cents/kWh). The Solar Carport Incentive Adder will be added to the competitively bid Performance Based Incentive of the specific project upon acceptance.

1) Does the Solar Project contain a Carport Structure?

Yes

Solar Carport Nameplate Capacity kW (installed on Carport Structure): 998 kW DC

Total Project Nameplate Capacity kW: 998 kW DC

Percentage of Solar Carport Nameplate Capacity / Total Project Nameplate Capacity: 100.00 %

Learn More - The Solar Carport Nameplate Capacity is the portion of the direct current (DC) nameplate capacity of a Solar DG Project that is installed above a permeable and/or non-permeable existing or new parking area and associated access and walkway areas (as recognized by the local municipal building and/or zoning department), which is installed in a manner that maintains the function of the area beneath the structure, and is continued to be used or available for use for such purposes for the term of enrollment in the tariff.

2) For the Solar Project that contains a Carport Structure, identify the cost of the carport structure contained in the Estimated Total Development Costs:

Estimated Total Development Costs of Project (\$): \$3,647,900

Estimated Cost of Carport Structure contained in Total Development Costs (\$): \$475,000

Certificate of Eligibility

Rhode Island Renewable Energy Growth Program

The Narragansett Electric Company d/b/a National Grid

This Certificate of Eligibility is written confirmation that the Distributed Generation (“DG”) Project referenced below has been selected for participation in the Rhode Island Renewable Energy Growth Program. The Project Applicant is bound by the terms and conditions of the Tariff for the Renewable Energy Growth Program (the “Non-Residential Tariff”) as well as Other Company Tariff Requirements described and referenced therein. In addition, the facility is interconnected with the distribution system of the Narragansett Electric Company and is located in the Narragansett Electric Company ISO-NE load zone.

Project Name: Superior Solar

**Project Owner/
Project Contact:** Superior Solar LLC
Drew Price

Facility Address: 2205 Broncos Highway
Burrillville, RI 02830

Phone Number: (434) 227-5086

Email Address: dprice@hexagon-energy.com

RI Interconnection Application ID or Case#: 00201787

Renewable Technology: Solar PV - ground mount
Solar PV – rooftop; Solar PV – ground mount; Wind; Anaerobic Digestion; Hydropower

Renewable Energy Class: CRDG Commercial Solar
Commercial Scale Solar; Large Scale Solar; Small Wind; Large Wind; Small DG Project; Large DG Project; CRDG Commercial Solar; CRDG Large Solar; Small Scale Hydropower I; Small Scale Hydropower II

Nameplate Capacity (kW): 991
Maximum rated output or gross output of a generator; For Solar, the total rated output of all panels measured in DC.

Maximum Hourly Output (kWh AC per hour): 750
Maximum amount of energy produced in an hour measured in AC for all technologies

Expected Annual Energy Output (MWh per year): 1,542
Expected amount of energy produced in a year measured in AC for all technologies

Applicable Renewable Energy Growth Program Tariff: Non-Residential Tariff

Indicate which tariff the Project Applicant is bound by the terms and conditions of: Renewable Energy Growth Program Tariff for Residential Customers, RIPUC No. 2151-F or Renewable Energy Growth Program Tariff for Non-Residential Customers, RIPUC No. 2152-F.

Required Performance Guarantee Deposit Paid (\$): \$38,550

Additional Required Performance Guarantee Deposit Paid (\$): \$0

Subject to the conditions set forth in Section 3.f of the Tariff, an Applicant may elect to extend the DG Project deadline a second time for providing the Output Certification by posting an additional Deposit amount equal to one-half of the original Deposit amount.

Performance Based Incentive (cents/kWh): 20.44

Term of Performance Based Incentive (# years): 20

The term of the applicable Tariff supplement beginning on the Certificate Effective Date.

Certificate Issuance Date: 01/16/2020

Payment Option: Option 2

Subject to the conditions set forth in Section 8.c of the Tariff, an Applicant must notify the Company of the manner by which it will be compensated for its output under the Program. Option 1 – Direct payment of the entire PBI or Option 2 – a combination of direct payment and customer bill credit.

Output Certification Deadline: 01/16/2022

If the Output Certification is not received within the required timeframe, subject to the conditions set forth in Section 3 of the Tariff, the project's Certificate of Eligibility will be voided and its performance guarantee deposit will be forfeited. Once a DG Project has provided the Output Certification, the Project then has 90 days to meet all other requirements pursuant to Section 8.a. of the Tariff in order to receive payment.

Certificate Effective Date: [Click here to enter a date.](#)

The performance-based incentive is paid beginning on this date for the applicable term of the tariff. As a condition of receiving payments, the Applicant must provide confirmation of: 1) the Company's written authority to interconnect to its electric distribution system and Applicant's payment of all amounts due; 2) Commission certification of the DG Project as an Eligible Renewable Energy Resource; 3) registration of the DG Project with the ISO-NE and NEPOOL GIS; 4) the Output Certification; and 5) being current with amounts due on the electric service accounts or fulfilling the requirements of an approved payment plan.

Certificate Termination Date: [Click here to enter a date.](#)

The performance-based incentive is paid up to this date covering the applicable 20-year term of the tariff. Section 11 of the Tariff highlights termination provisions under which the tariff might be terminated earlier than the stated Certificate Termination Date.

RE: EXT || Meeting sometime next week?

Renewable Contracts <RenewableContracts@nationalgrid.com>

Mon, Jul 20, 2020 at 1:08 PM

To: Buzz Becker <bbecker@hexagon-energy.com>

Cc: "Springsteel, Ian" <Ian.Springsteel@nationalgrid.com>, "Kearns, Christopher (DOA)" <christopher.kearns@energy.ri.gov>, "Beland, Shauna (DOA)" <shauna.beland@energy.ri.gov>

Hello Buzz,

I just got word back from the NG legal team. The RIPUC could not give us a timeframe for scheduling a meeting, for you to discuss your project segmentation appeal request. They also could not tell us how long the appeal process would take to get an approval. On Friday July 10th we also informed OER that we were contacting the RIPUC to open discussions on how your project should proceed with the project segmentation appeal request (since Chris and Shauna were included on your original e-mail exchange, I have included them here as an FYI). We have provided the RIPUC a talking point summary of your projects, based on the documentation you have provided to me over the past few months, in case you want to contact the RIPUC directly to discuss and work on scheduling the appeal meeting.

I was hoping to have this meeting scheduled timely for you, with the RIPUC, but that does not appear feasible. Please let me know if you would like to discuss any of these details.

Regards,

Tom

From: Buzz Becker <bbecker@hexagon-energy.com>
Sent: Friday, July 17, 2020 2:56 PM
To: Kender, Thomas <Thomas.Kender@nationalgrid.com>
Subject: EXT || Meeting sometime next week?

Hey Tom,

Hope your week is wrapping up well. Wanted to see if we were on track to have a meeting sometime next week.

We are excited to enroll the carport project but would feel more comfortable doing so after having that meeting first.

BUZZ BECKER

Development Manager | Hexagon Energy, LLC

722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

8/27/2020

Hexagon Energy Mail - RE: EXT II Meeting sometime next week?

P 434.326.4623

[Quoted text hidden]

**Buzz Becker** <bbecker@hexagon-energy.com>

Project Segmentation Question

Buzz Becker <bbecker@hexagon-energy.com>

Wed, Jan 15, 2020 at 2:13 PM

To: "Kender, Thomas" <Thomas.Kender@nationalgrid.com>, Ian.Springsteel@nationalgrid.com

Cc: Drew Price <dprice@hexagon-energy.com>, Daniel Bulka <dbulka@hexagon-energy.com>, Nick Ford <nford@hexagon-energy.com>, "Kearns, Christopher (DOA)" <christopher.kearns@energy.ri.gov>, "Beland, Shauna (DOA)" <shauna.beland@energy.ri.gov>

Good afternoon, Thomas and Ian.

Chris Kearns from OER asked us to put together a brief summary on two projects we are developing for REGrowth. While the projects are located on adjacent parcels, we believe there is no doubt that they meet the intent of the segmentation guidelines.

To summarize, the parcels are separately owned, in the process of permitting separately, on different interconnection timelines, and even different in structural nature (one carport, one ground-mount).

Please let us know when we can schedule a call to review and discuss.

BUZZ BECKER

Development Manager | Hexagon Energy, LLC



722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

P 434.326.4623

 **Hexagon Segmentation Letter - 13JAN.pdf**
2422K



Buzz Becker <bbecker@hexagon-energy.com>

RE: [EXTERNAL] : Fwd: Fw[2]: REgrowth Project Segmentation

Buzz Becker <bbecker@hexagon-energy.com>

Wed, Jan 15, 2020 at 2:07 PM

To: "Kearns, Christopher (DOA)" <Christopher.Kearns@energy.ri.gov>

Cc: "Beland, Shauna (DOA)" <Shauna.Beland@energy.ri.gov>, Nick Ford <nford@hexagon-energy.com>, Drew Price <dprice@hexagon-energy.com>

Will do. Thanks.

BUZZ BECKER

Development Manager | Hexagon Energy, LLC



722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

P 434.326.4623

On Wed, Jan 15, 2020 at 2:03 PM Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov> wrote:

Hi Buzz,

I would send the relevant new or updated information/questions on subject directly to National Grid REG team to get their thoughts and cc me and Shauna on the email.

Here's the NGRID Contacts:

Thomas.Kender@nationalgrid.comIan.Springsteel@nationalgrid.com

Thanks,

Chris

From: Buzz Becker <bbecker@hexagon-energy.com>**Sent:** Wednesday, January 15, 2020 1:56 PM**To:** Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov>**Cc:** Beland, Shauna (DOA) <Shauna.Beland@energy.ri.gov>; Nick Ford <nford@hexagon-energy.com>; Drew Price <dprice@hexagon-energy.com>**Subject:** Re: [EXTERNAL] : Fwd: Fw[2]: REgrowth Project Segmentation

Good afternoon, Chris.

When is a good time to discuss the segmentation report we provided?

BUZZ BECKER

Development Manager | Hexagon Energy, LLC



722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

P 434.326.4623

On Mon, Jan 13, 2020 at 5:04 PM Buzz Becker <bbecker@hexagon-energy.com> wrote:

Hey Chris,

Sorry for the delay here. Please see the attached report addressing the questions regarding segmentation--we think it's a pretty compelling case

When would be a good time to discuss with our team?

BUZZ BECKER

Development Manager | Hexagon Energy, LLC



722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

P 434.326.4623

On Wed, Nov 6, 2019 at 4:36 PM Buzz Becker <bbecker@hexagon-energy.com> wrote:

Great, that is helpful.

Talk to you soon.

BUZZ BECKER

Development Manager | Hexagon Energy, LLC



722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

P 434.326.4623

On Wed, Nov 6, 2019 at 4:31 PM Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov> wrote:

Hi Buzz,

I would suggest that you put together a brief narrative/overview of the site and 2 projects with the following items and we can look at this further with National Grid:

- Are the two parcels legally separate lots by the town and that is recognized in the towns mapping records
- Are the two parcels owned by the same owner or are they legally owned by two individuals or entities
- A copy of the site layouts for the 2-separate projects

Please note that the carport subject is still a proposal for the 2020 REG Program and subject to PUC review and decision in Jan or early Feb.

Thanks,

Chris

From: Buzz Becker <bbecker@hexagon-energy.com>
Sent: Wednesday, November 06, 2019 4:21 PM
To: Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov>
Cc: Beland, Shauna (DOA) <Shauna.Beland@energy.ri.gov>
Subject: Re: [EXTERNAL] : Fwd: Fw[2]: REgrowth Project Segmentation

Right, wanted to get clarity on the "same site" distinction. While the two parcels are adjacent to one another, their owners are completely unrelated, are being permitted individually, and have no economies of scale like two adjacent groundmounted projects might.

We believe these are meaningfully separate and meet the spirit of the regs so wanted to hear some feedback. Happy to share site layout info to show how difficult it would be to claim the two projects as segmented.

BUZZ BECKER

Development Manager | Hexagon Energy, LLC



722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

P 434.326.4623

On Wed, Nov 6, 2019 at 4:11 PM Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov> wrote:

Hi Buzz,

A new project in 2020 or 2021 that is just selling the power back to National Grid at the same site of a separate project awarded a tariff (also just selling the power to the grid) in the previous year's REG Program would fall under that 24-month wait period to elapse, before installing a new and separate ground mounted or carport system at the site, unless that new carport system is using the power produced on-site for a bill credit with the customer's electricity bill and not just selling the power back to National Grid.

So, if your company is awarded/signs a tariff for that 991 kW system in Nov/Dec 2019 from the 2019 REG Program year, then a new project at the site would be eligible with the 2022 REG Program year.

That is my understating, as we have only had 1 or 2 DG/REG projects that have pursued an additional project at the same site after the 24-month period had ended. Is that what you were looking for feedback on?

Thanks,

Chris

From: Buzz Becker <bbecker@hexagon-energy.com>
Sent: Wednesday, November 06, 2019 3:40 PM
To: Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov>
Subject: Re: [EXTERNAL] : Fwd: Fw[2]: REgrowth Project Segmentation

One this enrollment. The other would be submitted next year with the carport adder. Size just under 1MW.

BUZZ BECKER

Development Manager | Hexagon Energy, LLC



722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

P 434.326.4623

On Wed, Nov 6, 2019 at 3:36 PM Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov> wrote:

Hi Buzz,

Did you submit 1 or 2 separate REG applications during the most recent enrollment? You referenced a 991 kW system, but what was the other system size?

Thanks,

Chris

From: Buzz Becker <bbecker@hexagon-energy.com>
Sent: Wednesday, November 06, 2019 2:31 PM
To: Kearns, Christopher (DOA) <Christopher.Kearns@energy.ri.gov>
Subject: [EXTERNAL] : Fwd: Fw[2]: REgrowth Project Segmentation

Hey Chris,

Got a question about two projects we have. One is a ground mount 991kw we enrolled in October (fingers crossed). The other is a similar sized carport project that happens to be on an adjacent parcel.

These are obviously distinct and not looking to game size categories (we're parking semitrucks under the carport). Got a few minutes to discuss?

BUZZ BECKER

Development Manager | Hexagon Energy, LLC



722 Preston Ave, Ste 102 | Charlottesville, VA 22903

E bbecker@hexagon-energy.com

P 434.326.4623

----- Forwarded message -----

From: **Nick Ford** <nford@hexagon-energy.com>
Date: Wed, Nov 6, 2019 at 2:21 PM
Subject: Fw[2]: REgrowth Project Segmentation
To: Buzz Becker <bbecker@hexagon-energy.com>

----- Forwarded Message -----

From: "DeSousa, Jared" <Jared.DeSousa@nationalgrid.com>
To: "Nick Ford" <nford@hexagon-energy.com>
Sent: 11/6/2019 1:52:57 PM
Subject: FW: REgrowth Project Segmentation

Just alittle more clarification on this,

Below is the language from the tariff on Project Segmentation:

5. Project Segmentation Rhode Island law prohibits project segmentation in the RE Growth Program. In no case may a project developer be allowed to segment a distributed generation project on the same parcel or contiguous parcels into smaller sized projects in order to fall under a smaller size project classification. Subject to the exceptions below, projects proposed by a developer on the same parcel or contiguous parcels will be presumed to have been segmented and only one of the projects will be eligible for a Certificate of Eligibility. An Applicant may appeal the Company's decision to the Commission.

Before making its determination, the Company will look for one of the following exceptions to the prohibition on project segmentation:

- i. The DG Projects use different renewable energy resources; or
- ii. The DG Projects use the same renewable energy resource, but they are: (1) electrically segregated; (2) separately metered; and (3) can demonstrate that 24 months have elapsed between the commencement of operation for one DG Project and the commencement of construction of any additional DG Project.
- iii. DG Projects installed on contiguous parcels will not be considered segmented if they serve different Non-Residential Customers and both Customers receive bill credits under Option 2 as defined in Section 8.c.

If the Company determines that a DG Project is ineligible to enroll in the RE Growth Program due to project segmentation, such project may be eligible for compensation pursuant to the Net Metering Provision or through other energy market participation. Rhode Island law requires eligible Projects must not already be operating to participate in the RE Growth Program, therefore any Project receiving compensation pursuant to the Net Metering Provision is not eligible for the RE Growth Program. Furthermore, if an Applicant is awarded a Certificate of Eligibility for a DG Project and is receiving Performance-Based Incentive Payments pursuant to this Tariff it will not receive compensation pursuant to the Net Metering Provision for the same DG Project during the term specified in the applicable Tariff supplement.

I highlighted the sections that could be conveyed to the customer.

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Buzz Becker <bbecker@hexagon-energy.com>

RE: EXT || Project Segmentation Question

Kender, Thomas <Thomas.Kender@nationalgrid.com>

Wed, Jan 29, 2020 at 3:23 PM

To: Buzz Becker <bbecker@hexagon-energy.com>

Cc: Drew Price <dprice@hexagon-energy.com>, Daniel Bulka <dbulka@hexagon-energy.com>, Nick Ford <nford@hexagon-energy.com>, "Springsteel, Ian" <ian.Springsteel@nationalgrid.com>, "Kearns, Christopher (DOA)" <christopher.kearns@energy.ri.gov>, "Beland, Shauna (DOA)" <shauna.beland@energy.ri.gov>

Hello Buzz,

Thank you for providing the letter describing your two projects and meeting with Ian and I on Friday via a conference call. To summarize what we discuss I provide the following:

Description of projects and landowners

- Project A (Superior Solar, LLC) is a 991kW DC ground-mounted CRDG Solar project awarded in the 2019 3rd Open Enrollment.
- Project B is a prospective 991kW Commercial-Solar (Carport) project currently in the System Impact Study process and looking to participate in an upcoming REGrowth Open Enrollment.
- The contiguous parcels in question are unique, unrelated landowners (each with an individual option agreement with Hexagon Energy).

Project Segmentation Exception

Per tariff section 5, the Company will look for one of the following exceptions to the prohibition on project segmentation:

- i. The DG Projects use different renewable energy resources; or
- ii. The DG Projects use the same renewable energy resource, but they are: (1) electrically segregated; (2) separately metered; and (3) can demonstrate that 24 months have elapsed between the commencement of operation for one DG Project and the commencement of construction of any additional DG Project; or
- iii. DG Projects installed on contiguous parcels will not be considered segmented if they serve different Non-Residential Customers and both Customers receive bill credits under Option 2 as defined in Section 8.c.

Also, If the Company determines that a DG Project is ineligible to enroll in the RE Growth Program due to project segmentation, such project may be eligible for compensation pursuant to the Net Metering Provision or through other energy market participation.

Based on the above, your second project (Project B) has two options for the Company to determine it does not violate the prohibition on project segmentation:

1. Demonstrate that 24 months have elapsed between the commencement of operation of Project A and the commencement of construction of Project B; or
2. have both Customers receive bill credits under Option 2 as defined in Section 8.c.

From our discussion on Friday, you stated that you would rather not wait multiple years to develop Project B and that the customer associated with Project B does not have an on-site energy use large enough to participate in the bill credit option. **Because of this the Company can not grant Project B an exception to the prohibition on project segmentation and the project is ineligible to enroll in the REGrowth Program, at this time.**

Per tariff section 5, the project may be eligible for compensation pursuant to the Net Metering Provision or through other energy market participation. Also, an Applicant may appeal the Company's decision to the Commission. Please inform us of a Commission appeal and we will assist you where possible related to the REGrowth Program.

Regards,

Tom

Tom Kender

Lead Renewable Energy Trader

Energy Procurement – Environmental Transactions

[nationalgrid](#)

Cell: (516) 329-2431

Thomas.Kender@nationalgrid.com

From: Buzz Becker <bbecker@hexagon-energy.com>

Sent: Wednesday, January 15, 2020 2:13 PM

To: Kender, Thomas <Thomas.Kender@nationalgrid.com>; Springsteel, Ian <ian.Springsteel@nationalgrid.com>

Cc: Drew Price <dprice@hexagon-energy.com>; Daniel Bulka <dbulka@hexagon-energy.com>; Nick Ford <nford@hexagon-energy.com>; Kearns, Christopher (DOA) <christopher.kearns@energy.ri.gov>; Beland, Shauna (DOA) <shauna.beland@energy.ri.gov>

Subject: EXT || Project Segmentation Question

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Chris Kearns from OER asked us to put together a brief summary on two projects we are developing for REGrowth. While the projects are located on adjacent parcels, we believe there is no doubt that they meet the intent of the segmentation guidelines.

To summarize, the parcels are separately owned, in the process of permitting separately, on different interconnection timelines, and even different in structural nature (one carport, one ground-mount).

Please let us know when we can schedule a call to review and discuss.

 BUZZ BECKER

Development Manager | Hexagon Energy, LLC

[722 Preston Ave, Ste 102 | Charlottesville, VA 22903](#)

E bbecker@hexagon-energy.com

8/27/2020

Hexagon Energy Mail - RE: EXT II Project Segmentation Question

P 434.326.4623

[Quoted text hidden]