



**GDS Associates, Inc.**  
Engineers and Consultants

## MEMORANDUM

**To:** Nick Ucci, Dilip Shah, Cindy Wilson-Frias

**From:** Scott Albert

**Date:** July 19, 2013

**Cc:** Luly Massaro, Alan Nault, Bo Burditt

**Subject:** Existing/New Percentage Allocations – Docket 3814 – North Hartland Hydro

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This memo is written to describe the reasons for, and results from a recent recalculation of percent “New” and “Existing” allocations for the previously Commission-approved North Hartland RI RES-Eligible hydroelectric facility (Docket #3814).

**Revisions to Existing/New Percentage Allocations:**

Through previous Orders issued between May 2007 and April 2012, the Commission has approved eight hydroelectric generating units as being capable of producing both Existing and New Rhode Island-Eligible Renewable Energy Certificates (RECs). As part of the Commission’s responsibilities under Section 6.3 of State’s RES Regulation to verify the on-going eligibility of renewable energy generators and the production of energy from such Generation Units, GDS Associates, Inc. (the Commission’s consultant responsible for assisting in reviewing Renewable Energy Resource Eligibility Applications and verifying on-going eligibility) asked each of the facility owners for assistance providing updated monthly river flow and energy production details for all months subsequent to the data provided as part of their original application review and approval processes. The purpose of the updated data was to review and verify the continued validity of previously approved percent New and Existing allocations or to revise these percentages, if necessary.

Review of five of the eight hydroelectric generating units has been completed, now including this North Hartland facility (for which a slight change, from 25.6% New / 74.4% Existing to 23% New / 77% Existing, has been requested and verified as appropriate). Review of the remaining three units is still underway and will be brought to the Commissioners for action upon completion. The main reason for this change is the addition of a separate bypass flow turbine that became operational at the North Hartland site in 2012 (separate GIS # and metering arrangement with National Grid). This new unit is taking 25 cfs of water away from the previously approved new/existing facility – thus the % New from the previous and still fully operational North Harland facility is slightly lower than originally approved. See previous Order #18,984, issued in June 2007 and just completed recommendations/review documentation associated with their new bypass flow turbine (Docket #4395) for more details.

It was requested by the facility owner that the percentage changes become effective with the 2014 NEPOOL GIS Compliance Year. This request was made to reflect that commitments based on the Commission’s previously approved percentage values have already been (or are in the process of being) made for all RECs to be generated from the Company’s facility through the end of 2013, and that any mid-year change in percentage allocations could have a material adverse effect on the ability to market RECs from their project to buyers. We agree that the effective date for these changes should be coincident with the start of the NEPOOL GIS Q1 2014 compliance period (i.e., for RECs that will be created on July 15, 2014 for generation of energy between January 1 – March 31, 2014).