



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

## **M E M O R A N D U M**

**To:** Luly Massaro, Cindy Wilson-Frias

**From:** Scott Albert

**Date:** March 17, 2014

**Cc:** Alan Nault, Bo Burditt

**Subject:** Existing/New Percentage Allocations – Docket 3919 – Pepperell 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 Pepperell RI RES-Eligible hydroelectric facility (Docket #3919).

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

Through previous Orders issued between May 2007 and April 2012, the Commission had 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 six of the eight hydroelectric generating units has been completed, now including this Pepperell facility (for which a change, from 46.8% New / 53.2% Existing to 24% New / 76% Existing, has been requested and verified as appropriate). Review of the remaining two units is still underway and will be brought to the Commissioners for action upon completion. The main reason for this change is the use of more current and extended flow and generation records that have become available since the Commission’s issuance of its initial orders (19489 and 19490 – dated October 30, 2008).

To avoid interference with any commitments for RECs to be generated from the Pepperell facility through the end of 2013, these percentage changes should become effective 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).