Mini-Watt Hydroelectric LLC
c/o O'Connell Energy Group
57 Suffolk Street, Suite 200
Holyoke, Massachusetts 01040
(413) 534-4660 (main number)
(413) 537-9029 (cell); (413) 536-4911 (fax)
sfisk@oconnells.com

November 1, 2013

Via E-Mail & U.S. Mail

Rhode Island Public Utilities Commission
Attn: Renewable Energy Resources Eligibility
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket #4421; Application for Certification of 37% of Mini-Watt Hydroelectric, LLC's Orange #1 and Orange #2 hydro-electric generators (collectively, the "Oranges" or the "Project" or the "Facility") as a Rhode Island New Renewable Resource and 63% of the same Facility as a Rhode Island Existing Renewable Resource (the "Application")

Dear Sir:

Attached please find the Application of Mini-Watt Hydroelectric LLC ("Mini-Watt" or the "Applicant") for certification by the Rhode Island Public Utilities Commission (the "Commission") of 37% of its Orange #1 and Orange #2 hydro-electric generators as a Rhode Island New Renewable Resource and of 63% of the same Facility as a Rhode Island Existing Renewable Resource.[1]

I. The name, address and contacts of the Applicant –

Primary Contact:

William P. Short III
Consultant
44 West 62nd Street
P.O. Box 237173
New York, New York 10023-7173
(917) 206-0001 (office)
(917) 206-0001 (fax)

Secondary Contact:

Stephen J. Fisk
General Manager
c/o O'Connell Energy Group
57 Suffolk Street, Suite 200
Holyoke, Massachusetts 01040
(413) 534-4660 (main number)
(413) 536-4911 (fax)

[1] Originally, Mini-Watt filed the Application requesting 69% Rhode Island New and 31% Rhode Island Existing treatment only for Orange #2. For Orange #1 no Rhode Island New or Existing treatment was sought.

(201) 970-3707 (cell)
w.shortiii@verizon.net

(413) 537-9029 (cell)
sfisk@oconnells.com

II. Location of the Generation Facility –

New Home Dam, Millers River, Franklin County:

North Powerhouse – 18 Chase Court REAR, Orange, Massachusetts
South Powerhouse – 16 West River Street REAR, Orange, Massachusetts

Latitude/Longitude – 42^0 35' 21.21"N / 72^0 18' 38.08"W

III. Description of the Generation Facility –

Mini-Watt is a special purpose entity formed for the sole purpose to own the Facility, a three unit, 455 KW hydro-electric generator located in Orange, Massachusetts. The Facility's energy, capacity and ancillary services are presently sold to Templeton Municipal Light and Water Plant ("Templeton"). The Facility is interconnected to National Grid d/b/a Massachusetts Electric Company ("Massachusetts Electric") distribution lines located along Chase Court and West River Street. The dam was reconstructed in 1940 after the catastrophic flood of 1938 severely damaged the prior dam.

The North Powerhouse generating unit ("T1," a 1940 Leffel Z turbine with 175 KW generator) was installed at the time of the dam reconstruction. The South Powerhouse contains 2 generating units ("T2", a 1944 Leffel A turbine with 120 KW generator and "T3," a HSI double-regulated Kaplan turbine with 160 KW generator). T2 was relocated from a mill building along the Chicopee River located in Wilbraham, Massachusetts to its current location in the South Powerhouse in 1995. T3 was purchased new and installed in 2010, replacing a 1944 turbine-generator that had the same capacity as T2 (120 KW). T3 was placed in-service on or before November 30, 2010.

The Facility does not involve any new impoundment or diversion of water with an average salinity of twenty (20) parts per thousand or less.

IV. New and Existing Renewable Energy Resource –

The Oranges are both a New and Existing Renewable Energy Resource. Due to a strict interpretation of the definition of a New Renewable Energy Resource, complete New treatment is not possible for the production from the T3 generator of Orange #2.[2] Consequently, the Applicant at this time is only seeking partial New treatment for Orange #2. Nevertheless, the

[2] The Maine PUC did find that the production from the T3 generator was the equivalent of 100% New Renewable Energy Resource.

Applicant reserves its rights to re-open this docket in the future if the Commission amends its regulations to permit complete New treatment for the T3 generator of Orange #2.

Monthly generation records for the Project were obtained from the Applicant for the period of 1995 through 2001 and from the NEPOOL GIS for the period from 2002 through September 2013. Generator records were adjusted after 2004 for a change of mode of operations from store-and-release to run-of-river mode of operations. This adjustment increased theoretical generation to account for decreased generator efficiency by this change in mode of operations. The decreased generator efficiency was estimated to range from a 5% decrease in production in second quarter, to a 7.5% decrease in production in the first quarter, to a 10% decrease in production in fourth quarter and to a 50% decrease in production in the third quarter. All monthly production was further subjected to additional adjustment if monthly production exceeded 5.98 MWh per day for the Pre-Improvement Period[3] and 7.87 MWh per day for the Post Improvement Period.[4]

Monthly streamflow data of the Millers River at the USGS gage at Erving, Massachusetts was obtained from the USGS for the period of 1991 through September 2013, a nearly twenty-three year period. The streamflow data was then decreased by approximately 13.17% to account for the decrease in the watershed between the gage and the Project.[5] Streamflow at the Project was also adjusted to account for any permanent decrease of flow away from the turbines. First, all streamflow at the Project was adjusted for 45 cfs of leakage through the dam. Then, in July 2001 the minimum flow was increased from 45 cfs to 70 cfs to account for the installation of downstream fish passage on the south side of the dam. Next, in July 2002 the minimum flow was increased from 70 cfs to 74 cfs to account for the requirement that the dam maintain a minimum flow of one inch of water over the crest of the dam. Finally, in July 2003 the minimum flow was increased from 74 cfs to 99 cfs to account for the installation of downstream fish passage on the north side of the dam.

Mini-Watt is filing this application with the Commission after having completed a number of capital and efficiency improvements to increase the Project's electric production. Mini-Watt retired the old T3 turbine-generator set in 2010 by replacing completely the previous unit (a propeller turbine), including structural modifications, to accommodate a new double-regulated Kaplan turbine-generator set. This new turbine-generator set has greater capacity and higher efficiency than the previous turbine. All major components of T3 were replaced except for the Orange #2 station transformer. Although major equipment changes were made to both T1 and T2, there were no equivalent changes made to either turbine or the structures upon which these turbines sit. The replacement of T3 did result in a 9.64% increase in the nameplate of the Facility (415 KW to 455 KW or 40 KW). Capital and efficiency improvements did materially increase the annual production of the Facility, adjusting for changes in streamflow and mode of operation, from 1,672 MWh (January 1995 – November 2010) to 2,645 MWh now (December 2010 through September 2013).

[3] The Pre-Improvement Period consists of the time from January 1995 until November 2010.
[4] The Post Improvement Period consists of the time from December 2010 until September 2013.
[5] The Project drains an area of 323 square miles while the Millers River at the gage drains an area of 372 square miles.

Calculation of hydro-electric power plant efficiency (electric production in MWh divided by streamflow in cfs) of the Project for both the Pre- and Post Improvement Periods were made. Any monthly flow above 628 cfs (or 574 cfs for the Post Improvement Period) was discarded as were the results for those months when the Facility was out-of-service for lengthy repairs or maintenance or the installation of capital or efficiency improvements. On the former adjustment, the Project is undersized for monthly streamflows of greater than 628 cfs (or 574 cfs for the Post Improvement Period). On the latter adjustment, these results were discarded because low flow is not indicative of equipment performance while low generation might also not be.

The Pre-Improvement and Post Improvement Periods produce an average monthly hydro-electric power plant efficiency of 0.31 and 0.56, respectively. This analysis indicates that 37% of the Post Improvement electric production is attributed to the post November 2010 capital and efficiency improvements when compared to the Pre-Improvement Period.

Based upon the generation performance of the Facility for December 2010 through September 2013, Mini-Watt requests that 37% of the Oranges be certified as Rhode Island New and 63% of Oranges be certified as Rhode Island Existing. Upon request and grant of confidential treatment, Mini-Watt will provide the Commission with a copy of its analysis.

V. Qualification for Comparable Renewable Portfolio Standard Requirement –

Mini-Watt has already self-certified the entire Facility as a Maine Class II renewable resource. The Maine Public Utility Commission ("MPUC") has certified the production from T3 as a Maine Class I renewable resource. Mini-Watt intends to qualify in the future some or all of the production from the Oranges as being from a Connecticut Class I source or a New Hampshire Class I resource.

VI. Other Information –

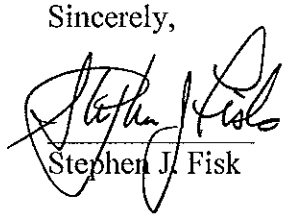
The Facility's electrical output is read by Massachusetts Municipal Wholesale Electric Company ("MMWEC"). The output of T1 is reported under MSS generator #854 as Orange #1 while the combined output of T2 and T3 is reported under MSS generator #855 as Orange #2. This information is conveyed to ISO New England, Inc. ("ISO-NE"), which in turn conveys it directly to APX, Inc., the operator of the NEPOOL Generation Information System ("GIS").

Quarterly, Mini-Watt files a confidential generation report with the Maine Public Utilities Commission ("MPUC") in which it reports its generation production from T1 (MSS Generator #854) as Orange #1, T2 (as part of MSS Generator # 855) and T3 (also as part of MSS Generator #855). The percentage of the production from Orange #2 attributed to T3 is calculated and, once accepted by MPUC, that report and its percentage are sent to APX, Inc. APX, Inc. then adjusts the percentage of Orange #2 that qualifies for Maine Class I treatment. Upon request and grant of confidential treatment, copies of such correspondence will be made available to the Commission.

The Applicant has authorized APX to disclose to the Commission the Facility's monthly generation production.

Upon review of the Application, if you have any questions or concerns, please do not hesitate to contact either of the aforementioned persons.

Sincerely,



Stephen J. Fisk

enclosures

cc: William P. Short III (e-mail only)
Steve Berry (e-mail only)
Service List

List of Enclosures or Website Links

Rhode Island RES Application Form

Analysis of the Oranges Project's Hydro-electric Efficiency (1995-2013)[6]

Order Granting Exemption from Licensing of a Small Hydroelectric Project of Five Megawatts or Less (Issued December 28, 1984)[7]

Order Amending Exemption (Issued May 5, 2009)

Order Approving Streamflow Compliance Monitoring Plan (Issued August 2, 2010)

Other States' RPS Certification –

Maine[8]

Pre-Construction, Construction and Post Construction Reports and Photographs of the Facility

[6] Items marked in **Red and Bold** are considered confidential by the Applicant. Upon request from the Commission and the granting of confidential treatment, Mini-Watt will provide the Commission with a copy of this analysis.

[7] Items marked in **Blue and Bold** have been previously submitted to the Commission in Docket #4421 and, consequently, were not resubmitted with this cover letter.

[8] The MPUC does not issue orders confirming that a generation facility has been certified as Maine Class II renewable resource.

RIPUC Use Only
Date Application Received: __ __ / __ __ / __ __
Date Review Completed: __ __ / __ __ / __ __
Date Commission Action: __ __ / __ __ / __ __
Date Commission Approved: __ __ / __ __ / __ __

GIS Certification #:
MSS #854
MSS #855

RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM

The Standard Application Form
Required of all Applicants for Certification of Eligibility of Renewable Energy Resource
(Version 7 – June 11, 2010)

STATE OF RHODEISLAND PUBLIC UTILITIES COMMISSION
Pursuant to the Renewable Energy Act
Section 39-26-1 et. seq. of the General Laws of Rhode Island

NOTICE:
When completing this Renewable Energy Resources Eligibility Form and any applicable Appendices, please refer to the State of Rhode Island and Providence Plantations Public Utilities Commission Rules and Regulations Governing the Implementation of a Renewable Energy Standard (RES Regulations, Effective Date: January 1, 2006), and the associated RES Certification Filing Methodology Guide. All applicable regulations, procedures and guidelines are available on the Commission's web site: www.ripuc.org/utilityinfo/res.html. Also, all filings must be in conformance with the Commission's Rules of Practice and Procedure, in particular, Rule 1.5, or its successor regulation, entitled "Formal Requirements as to Filings."

• Please complete the Renewable Energy Resources Eligibility Form and Appendices using a typewriter or black ink.

• Please submit one original and three copies of the completed Application Form, applicable Appendices and all supporting documentation to the Commission at the following address:

Rhode Island Public Utilities Commission
89 Jefferson Blvd
Warwick, RI02888
Attn: Renewable Energy Resources Eligibility

In addition to the paper copies, electronic/email submittals are required under Commission regulations. Such electronic submittals should be sent to: Luly E. Massaro, Commission Clerk at lmassaro@puc.state.ri.us

•In addition to filing with the Commission, Applicants are required to send, electronically or electronically and in paper format, a copy of the completed Application including all attachments and supporting documentation, to the Division of Public Utilities and Carriers and to all interested parties. A list of interested parties can be obtained from the Commission's website at www.ripuc.org/utilityinfo/res.html.

•Keep a copy of the completed Application for your records.

•The Commission will notify the Authorized Representative if the Application is incomplete.

• Pursuant to Section 6.0 of the RES Regulations, the Commission shall provide a thirty (30) day period for public comment following posting of any administratively complete Application.

• Please note that all information submitted on or attached to the Application is considered to be a public record unless the Commission agrees to deem some portion of the application confidential after consideration under section 1.2(g) of the Commission's Rules of Practice and Procedure.

•In accordance with Section 6.2 of the RES Regulations, the Commission will provide prospective reviews for Applicants seeking a preliminary determination as to whether a facility would be eligible prior to the formal certification process described in Section 6.1 of the RES Regulations. Please note that space is provided on the Form for applicant to designate the type of review being requested.

• Questions related to this Renewable Energy Resources Eligibility Form should be submitted in writing, preferably via email and directed to: Luly E. Massaro, Commission Clerk at lmassaro@puc.state.ri.us

SECTION I: Identification Information

1.1 Name of Generation Unit (sufficient for full and unique identification):

Orange #1 and Orange #2 (collectively also known as Mini-Watt Hydroelectric)

1.2 Type of Certification being requested (check one):

X Standard Certification ❑ Prospective Certification (Declaratory Judgment)

1.3 This Application includes: (Check all that apply)[1]

- ❑ APPENDIX A: Authorized Representative Certification for Individual Owner or Operator
- X APPENDIX B: Authorized Representative Certification for Non-Corporate Entities Other Than Individuals
- X APPENDIX C: Existing Renewable Energy Resources
- ❑ APPENDIX D: Special Provisions for Aggregators of Customer-sited or Off-grid Generation Facilities
- ❑ APPENDIX E: Special Provisions for a Generation Unit Located in a Control Area Adjacent to NEPOOL
- ❑ APPENDIX F: Fuel Source Plan for Eligible Biomass Fuels

1.4 Primary Contact Person name and title:

William P. Short III, Consultant

1.5 Primary Contact Person address and contact information:

Address: **P.O. Box 237173**
New York, New York 10023-7173
Phone: **(917) 206-0001** Fax: **(917) 206-0001**
Email: **w.shortiii@verizon.net**

1.6 Backup Contact Person name and title:

Stephen J. Fisk, General Manager

1.7 Backup Contact Person address and contact information:

Address: **Mini-Watt Hydroelectric, LLC**
c/o O'Connell Energy Group
57 Suffolk Street, Suite 200
Holyoke, Massachusetts 01040
Phone: **(413) 534-4660** Fax: **(413) 536-4911**
Email: **sfisk@oconnells.com**

[1] Please note that all Applicants are required to complete the Renewable Energy Resources Eligibility Standard Application Form and all of the Appendices that apply to the Generation Unit or Owner or Operator that is the subject of this Form. Please omit Appendices that do not apply.

1.8 Name and Title of Authorized Representative (*i.e.*, the individual responsible for certifying the accuracy of all information contained in this form and associated appendices, and whose signature will appear on the application):

William P. Short III, Consultant

Appendix A or B (as appropriate) completed and attached? ❑ Yes ❑ No **X** N/A

1.9 Authorized Representative address and contact information:

Address:
P.O. Box 237173
New York, New York 10023-7173

Phone: **(917) 206-0001** Fax: **(917) 206-0001**

Email: **w.shortiii@verizon.net**

1.10 Owner name and title:

Stephen J. Fisk, General Manager

1.11 Owner address and contact information:

Address: **Mini-Watt Hydroelectric, LLC**
c/o O'Connell Energy Group
57 Suffolk Street, Suite 200
Holyoke, Massachusetts 01040

Phone: **(413) 534-4660** Fax: **(413) 536-4911**

Email: **sfisk@oconnells.com**

1.12 Owner business organization type (check one):

❑ Individual
❑ Partnership
❑ Corporation
X Other: **Massachusetts Limited Liability Company**

1.13 Operator name and title: **Stephen J. Fisk, General Manager**

Operator address and contact information:

Address: **O'Connell Energy Group**
57 Suffolk Street, Suite 200
Holyoke, Massachusetts 01040

Phone: **(413) 534-4660** Fax: **(413) 536-4911**

Email: **sfisk@oconnells.com**

1.14 Operator business organization type (check one):

❑ Individual
❑ Partnership
❑ Corporation
X Other: **Massachusetts Limited Liability Company**

SECTION II: Generation Unit Information, Fuels, Energy Resources and Technologies

2.1 ISO-NE Generation Unit Asset Identification Number or NEPOOL GIS Identification Number (either or both as applicable): **MSS #854 (Orange #1) and MSS #855 (Orange #2)**

2.2 Generation Unit Nameplate Capacity: **0.455 MW (both Orange #1 and Orange #2)**

2.3 Maximum Demonstrated Capacity: **0.455 MW (both Orange #1 and Orange #2)**

2.4 Please indicate which of the following Eligible Renewable Energy Resources are used by the Generation Unit: (Check ALL that apply) – *per RES Regulations Section 5.0*

- ❑ Direct solar radiation
- ❑ The wind
- ❑ Movement of or the latent heat of the ocean
- ❑ The heat of the earth
- X Small hydro facilities
- ❑ Biomass facilities using Eligible Biomass Fuels and maintaining compliance with all aspects of current air permits; Eligible Biomass Fuels may be co-fired with fossil fuels, provided that only the renewable energy fraction of production from multi-fuel facilities shall be considered eligible.
- ❑ Biomass facilities using unlisted biomass fuel
- ❑ Biomass facilities, multi-fueled or using fossil fuel co-firing
- ❑ Fuel cells using a renewable resource referenced in this section

2.5 If the box checked in Section 2.4 above is "Small hydro facilities", please certify that the facility's aggregate capacity does not exceed 30 MW. – *per RES Regulations Section 3.32*

X← check this box to certify that the above statement is true

❑ N/A or other (please explain) _____

_____

2.6 If the box checked in Section 2.4 above is "Small hydro facilities", please certify that the facility does not involve any new impoundment or diversion of water with an average salinity of twenty (20) parts per thousand or less. – *per RES Regulations Section 3.32*

X← check this box to certify that the above statement is true

❑ N/A or other (please explain) _____

_____

2.7 If you checked one of the Biomass facilities boxes in Section 2.4 above, please respond to the following:

A. Please specify the fuel or fuels used or to be used in the Unit: _____

_____

B. Please complete and attach Appendix F, Eligible Biomass Fuel Source Plan.

Appendix F completed and attached? ❑ Yes ❑ No ❑ N/A

2.8 Has the Generation Unit been certified as a Renewable Energy Resource for eligibility in another state's renewable portfolio standard?

X Yes ❑ No If yes, please attach a copy of that state's certifying order.

Copy of State's certifying order attached? X Yes X No ❑ N/A

SECTION III: Commercial Operation Date

Please provide documentation to support all claims and responses to the following questions:

3.1 Date Generation Unit first entered Commercial Operation: **1940 for T1, 1995 for T2 and 11/30/2010 for T3** at the site.

If the commercial operation date is after December 31, 1997, please provide independent verification, such as the utility log or metering data, showing that the meter first spun after December 31, 1997. This is needed in order to verify that the facility qualifies as a New Renewable Energy Resource.

Documentation attached? ❑ Yes ❑ No X N/A

3.2 Is there an Existing Renewable Energy Resource located at the site of Generation Unit?

X Yes
❑ No

3.3 If the date entered in response to question 3.1 is earlier than December 31, 1997 or if you checked "Yes" in response to question 3.2 above, please complete Appendix C.

Appendix C completed and attached? X Yes ❑ No ❑ N/A

3.4 Was all or any part of the Generation Unit used on or before December 31, 1997 to generate electricity at any other site?

X Yes
❑ No

3.5 If you checked "Yes" to question 3.4 above, please specify the power production equipment used and the address where such power production equipment produced electricity (attach more detail if the space provided is not sufficient): **T2 of Orange #2 was relocated from a mill building along the Chicopee River located in Wilbraham, Massachusetts to its current location in the South Powerhouse in 1995.**

SECTION IV: Metering

4.1 Please indicate how the Generation Unit's electrical energy output is verified (check all that apply):

- **X** ISO-NE Market Settlement System
- ❑ Self-reported to the NEPOOL GIS Administrator
- ❑ Other (please specify below and see Appendix D: Eligibility for Aggregations):

_____

Appendix D completed and attached? ❑ Yes ❑ No **X** N/A

SECTION V: Location

5.1 Please check one of the following that apply to the Generation Unit:

- **X** Grid Connected Generation
- ❑ Off-Grid Generation (not connected to a utility transmission or distribution system)
- ❑ Customer Sited Generation (interconnected on the end-use customer 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)

5.2 Generation Unit address: **Orange #1 is located on the Millers River at 16 West River Street REAR, Orange, Massachusetts while Orange #2 is located on the Millers River at 18 Chase Court REAR, Orange, Massachusetts.**

5.3 Please provide the Generation Unit's geographic location information:

A. Universal Transverse Mercator Coordinates: _____

B. Latitude/Longitude – **42^0 35' 21.21"N / 72^0 18' 38.08"W**

5.4 The Generation Unit located: (please check the appropriate box)

- **X** In the NEPOOL control area
- ❑ In a control area adjacent to the NEPOOL control area
- ❑ In a control area other than NEPOOL which is not adjacent to the NEPOOL control area ←*If you checked this box, then the generator does not qualify for the RI RES – therefore, please do not complete/submit this form.*

5.5 If you checked "In a control area adjacent to the NEPOOL control area" in Section 5.4 above, please complete Appendix E.

Appendix E completed and attached? ❑ Yes ❑ No **X** N/A

SECTION VI: Certification

6.1 Please attach documentation, using one of the applicable forms below, demonstrating the authority of the Authorized Representative indicated in Section 1.8 to certify and submit this Application.

Corporations

If the Owner or Operator is a corporation, the Authorized Representative shall provide **either**:

(a) Evidence of a board of directors vote granting authority to the Authorized Representative to execute the Renewable Energy Resources Eligibility Form, **or**

(b) A certification from the Corporate Clerk or Secretary of the Corporation that the Authorized Representative is authorized to execute the Renewable Energy Resources Eligibility Form or is otherwise authorized to legally bind the corporation in like matters.

Evidence of Board Vote provided? ❑ Yes ❑ No X N/A

Corporate Certification provided? ❑ Yes ❑ No X N/A

Individuals

If the Owner or Operator is an individual, that individual shall complete and attach APPENDIX A, or a similar form of certification from the Owner or Operator, duly notarized, that certifies that the Authorized Representative has authority to execute the Renewable Energy Resources Eligibility Form.

Appendix A completed and attached? ❑ Yes ❑ No X N/A

Non-Corporate Entities

(Proprietorships, Partnerships, Cooperatives, etc.) If the Owner or Operator is not an individual or a corporation, it shall complete and attach APPENDIX B or execute a resolution indicating that the Authorized Representative named in Section 1.8 has authority to execute the Renewable Energy Resources Eligibility Form or to otherwise legally bind the non-corporate entity in like matters.

Appendix B completed and attached? X Yes ❑ No ❑ N/A

6.2 Authorized Representative Certification and Signature:

I hereby certify, under pains and penalties of perjury, that I have personally examined and am familiar with the information submitted herein and based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties, both civil and criminal, for submitting false information, including possible fines and punishment. My signature below certifies all information submitted on this Renewable Energy Resources Eligibility Form. The Renewable Energy Resources Eligibility Form includes the Standard Application Form and all required Appendices and attachments. I acknowledge that the Generation Unit is obligated to and will notify the Commission promptly in the event of a change in a generator's eligibility status (including, without limitation, the status of the air permits) and that when and if, in the Commission's opinion, after due consideration, there is a material change in the characteristics of a Generation Unit or its fuel stream that could alter its eligibility, such Generation Unit must be re-certified in accordance with Section 9.0 of the RES Regulations. I further acknowledge that the Generation Unit is obligated to and will file such quarterly or other reports as required by the Regulations and the Commission in its certification order. I understand that the Generation Unit will be immediately de-certified if it fails to file such reports.

Signature of Authorized Representative:

SIGNATURE: William P. Short III

DATE: November 1, 2013

Consultant
(Title)

GIS Certification #:
MSS #854
MSS #855

APPENDIX B
(Required When Owner or Operator is a Non-Corporate Entity Other Than An Individual)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISION

RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM
Pursuant to the Renewable Energy Act
Section 39-26-1 et. seq. of the General Laws of Rhode Island

RESOLUTION OF AUTHORIZATION

Resolved: that **William P. Short III**, named in Section 1.8 of the Renewable Energy Resources Eligibility Form as Authorized Representative, is authorized to execute the Application on the behalf of **Mini-Watt Hydroelectric LLC**, the Owner or Operator of the Generation Unit named in section 1.1 of the Application.

SIGNATURE: James N. Sullivan, Treasurer DATE: 10.30.13

James N. Sullivan, Treasurer of O'Connell Development Group Inc., Manager of Mini-Watt Hydroelectric LLC

State: Commonwealth of Massachusetts

County: Hampden County

I, Laura C. Tereso as a notary public, certify that I witnessed the signature of the above named James N. Sullivan, and that said person stated that he is authorized to execute this resolution, and the individual verified his identity to me, on this date: October 30, 2013.

SIGNATURE: Laura C. Tereso DATE: 10/30/13

My commission expires on: _____ NOTARY SEAL:

LAURA C. TERESO
Notary Public
Massachusetts
Commission Expires Sep 19, 2019

GIS Certification #:
MSS #854
MSS #855

APPENDIX C
(Revised 6/11/10)
(Required of all Applicants with Generation Units at the Site of Existing Renewable Energy Resources)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISION

RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM
Pursuant to the Renewable Energy Act
Section 39-26-1 et. seq. of the General Laws of Rhode Island

If the Generation Unit: (1) first entered into commercial operation before December 31, 1997; or (2) is located at the exact site of an Existing Renewable Energy Resource, please complete the following and attach documentation, as necessary to support all responses:

C.1 Is the Generating Unit seeking certification, either in whole or in part, as a New Renewable Energy Resource? X Yes ❑ No

C.2 If you answered "Yes" to question C.1, please complete the remainder of Appendix C. If you answered "No" and are seeking certification entirely as an Existing Renewable Energy Resource, you do NOT need to complete the remainder of Appendix C.

C.3 If an Existing Renewable Energy Resource is/was located at the site, has such Existing Renewable Energy Resource been retired and replaced with the new Generation Unit at the same site? X Yes X No

C.4 Is the Generation Unit a Repowered Generation Unit (as defined in Section 3.29 of the RES Regulations) which uses Eligible Renewable Energy Resources and which first entered commercial operation after December 31, 1997 at the site of an existing Generation Unit? ❑ Yes X No

C.5 If you checked "Yes" to question C.4 above, please provide documentation to support that the entire output of the Repowered Generation Unit first entered commercial operation after December 31, 1997.

C.6 Is the Generation Unit a multi-fuel facility in which an Eligible Biomass Fuel is first co-fired with fossil fuels after December 31, 1997? ❑ Yes X No

C.7 If you checked "Yes" to question C.6 above, please provide documentation to support that the renewable energy fraction of the energy output first occurred after December 31, 1997.

C.8 Is the Generation Unit an Existing Renewable Energy Resource other than an Intermittent Resource (as defined in Sections 3.10 and 3.15 of the RES Regulations)? ❑ Yes **X** No

C.9 If you checked "Yes" to question C.8 above, please attach evidence of completed capital investments after December 31, 1997 attributable to efficiency improvements or additions of capacity that are sufficient to, were intended to, and can be demonstrated to increase annual electricity output in excess of ten percent (10%). As specified in Section 3.23.v of the RES Regulations, the determination of incremental production shall not be based on any operational changes at such facility **not directly** associated with the efficiency improvements or additions of capacity.

Please provide the single proposed percentage of production to be deemed incremental, attributable to the efficiency improvements or additions of capacity placed in service after December 31, 1997. Please make this calculation by comparing actual electrical output over the three calendar years 1995-1997 (the "Historical Generation Baseline") with the actual output following the improvements. The incremental production above the Historical Generation Baseline will be considered "New" generation for the purposes of RES. Please give the percentage of the facility's total output that qualifies as such to be considered "New" generation.

C.10 Is the Generating Unit an Existing Renewable Energy Resource that is an Intermittent Resource? **X** Yes **X** No

C.11 If you checked "Yes" to question C.10 above, please attach evidence of completed capital investments after December 31, 1997 attributable to efficiency improvements or additions of capacity that are sufficient to, were intended to, and have demonstrated on a normalized basis to increase annual electricity output in excess of ten percent (10%). The determination of incremental production shall not be based on any operational changes at such facility **not directly** associated with the efficiency improvements or additions of capacity. In no event shall any production that would have existed during the Historical Generation Baseline period in the absence of the efficiency improvements or additions to capacity be considered incremental production. Please refer to Section 3.23.vi of the RES Regulations for further guidance.

C.12 If you checked "Yes" to C.10, provide the single proposed percentage of production to be deemed incremental, attributable to the efficiency improvements or additions of capacity placed in service after December 31, 1997. The incremental production above the Historical Generation Baseline will be considered "New" generation for the purposes of RES. Please make this calculation by comparing actual monthly electrical output over the three calendar years 1995-1997 (the "Historical Generation Baseline") with the actual output following the improvements on a normalized basis. Please provide back-up information sufficient for the Commission to make a determination of this incremental production percentage.

For example, for small hydro facilities, please use historical river flow data to create a monthly normalized comparison (e.g. average MWh produced per cubic foot/second of river flow for each month) between actual output values post-improvements with the Historical Generation Baseline. For solar and wind facilities, please use historical solar irradiation, wind flow, or other applicable data to normalize the facility's current production against the Historical Generation Baseline.

C.13 If you checked "no" to both C.3 and C.4 above, please complete the following:

a. Was the Existing Renewable Energy Resource located at the exact site at any time during calendar years 1995 through 1997? X Yes X No

b. If you checked "yes" in Subsection (a) above, please provide the Generation Unit Asset Identification Number and the average annual electrical production (MWhs) for the three calendar years 1995 through 1997, or for the first 36 months after the Commercial Operation Date if that date is after December 31, 1994, for each such Generation Unit.

c. Please attach a copy of the derivation of the average provided in (b) above, along with documentation support (such as ISO reports) for the information provided in Subsection (b) above. Data must be consistent with quantities used for ISO Market Settlement System.