

August 21, 2015

**VIA HAND DELIVERY & ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket 4574 - Review of Power Purchase Agreement – Copenhagen Wind Farm, LLC  
Pursuant to Rhode Island General Laws § 39-26.1-1 *et seq.*  
Responses to Division Data Requests – Set 1**

Dear Ms. Massaro:

On behalf of National Grid<sup>1</sup> I have enclosed the Company's responses to data requests that were issued by the Rhode Island Division of Public Utilities and Carriers on August 13, 2015 in the above-referenced docket.

Thank you for your attention to this transmittal. If you have any questions, please contact me at (401) 784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4574 Service List  
Leo Wold, Esq.  
Jon Hagopian, Esq.  
Steve Scialabba, Division

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

Paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

\_\_\_\_\_  
Joanne M. Scanlon

August 21, 2015  
Date

**Docket No. 4574 - National Grid – Review of PPA - Copenhagen Wind Farm, LLC  
Service List updated 8/18/15**

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**  
**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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**Review of Copenhagen Wind, LLC  
Power Purchase Agreement  
Pursuant to R.I.G.L. § 39-26.1 *et seq.***

**Docket No. 4574**

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**NATIONAL GRID'S REQUEST  
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid<sup>1</sup> hereby requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by PUC Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(B). National Grid also hereby requests that, pending entry of that finding, the PUC preliminarily grant National Grid's request for confidential treatment pursuant to Rule 1.2 (g)(2).

**I. BACKGROUND**

On August 21, 2015, National Grid is filing with the PUC its responses to the Division of Public Utilities and Carriers' (Division) First Set of Data Requests. Division Data Request 1-2 requests the detailed scoring for each proposal that was submitted in response to the Company's Request for Proposal in the fourth solicitation. In response to Division Data Request 1-2, the Company is providing redacted and unredacted versions of the non-price scoring sheets for each bidder as Attachment DIV 1-2-A, as well as a

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company").

live spreadsheet calculating the price scores on a confidential CD-ROM identified as Attachment DIV 1-2-B. These non-price scoring sheets and price calculations contain confidential and proprietary bidder information as well as bid evaluation information. Therefore, National Grid requests that the PUC give the information contained in the unredacted version of Attachment DIV1-2-A and the confidential CD-ROM identified as Attachment DIV 1-2-B confidential treatment.

Division Data Requests 1-3 requests the live spreadsheet that was used to create Exhibit 2 (Confidential) to the testimony of Corinne M. DiDomenico. In response to Division Data Request 1-3, the Company is providing the information on a confidential CD-ROM, identified as Attachment DIV 1-3. In addition, Division Data Request 1-8 that the Company clarify and correct, if necessary, the expected Commercial Operation Date. In response to Division Data Request 1-8, the Company is providing revised redacted and unredacted versions of Exhibit 2 reflecting the updated Commercial Operation Date. The Company previously submitted a hard copy version of Exhibit 2 (Confidential) to the PUC on August 7, 2015, which is the subject of a Motion for Protective Treatment pending before the PUC. In addition, Attachment DIV 1-3 is a working spreadsheet of Exhibit 2 (Confidential), which illustrates a comparison of the Copenhagen Wind PPA pricing to the market forecast for energy, capacity, and renewable energy credits (RECs) prepared by ESAI Energy Security Analysis, Inc. (ESAI). Likewise, Attachment DIV 1-8 is an updated hard copy version of Exhibit 2 (Revised).

The working spreadsheets in Attachment DIV 1-3 and Attachment DIV 1-8 contain market price forecasts for energy, capacity, and RECs, which ESAI prepared while acting as a consultant to National Grid and at National Grid's request. Under

National Grid's arrangement with ESAI, the forecasts are considered proprietary.

Therefore, National Grid requests that the PUC give the information contained in Attachment DIV 1-3 and Attachment DIV 1-8 confidential treatment.

Division Data Request 1-4(c) requests the workpapers and analysis supporting Copenhagen Wind, LLC's (Copenhagen) estimated annual curtailment of 15%. In response to Division Data Request 1-4(c), the Company is providing a copy of the report by Customized Energy Solutions as Attachment DIV 1-4(c). This report was prepared on behalf of Copenhagen Wind, which they in turn provided to the Company. The report is marked as confidential. Therefore, National Grid requests that the PUC give entire report contained in Attachment DIV 1-4(c) confidential treatment.

Last, Division Data Request 1-10 requests the carbon price and natural gas price forecasts behind the ESAI power price forecast. In response to Division Data Request 1-10, the Company is providing the ESAI gas price and RGGI assumptions as of August 2014 as Attachment DIV 1-10. Similar to the ESAI power price forecasts, these forecasts and assumptions are considered proprietary. Therefore, National Grid requests that the PUC give the information contained in Attachment DIV 1-10 confidential treatment.

## **II. LEGAL STANDARD**

The PUC's Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act ("APRA"), R.I.G.L. §38-2-1 *et seq.* Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I.G.L. §38-2-2(4). Therefore, to the extent that information

provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I.G.L. §38-2-2(4)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies where disclosure of information would be likely either (1) to impair the Government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001).

The first prong of the test is satisfied when information is voluntarily provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47.

## **II. BASIS FOR CONFIDENTIALITY**

The information contained in the un-redacted version of Attachment DIV 1-2-A and the confidential CD-ROM identified as Attachment DIV 1-2-B contain confidential and proprietary bidder information, including pricing information and bid-evaluation information. This information was obtained from bidders under a confidentiality agreement and contains their confidential pricing data. National Grid is providing a

confidential CD-ROM as Attachment DIV 1-2-B and the un-redacted version of Attachment DIV 1-2-A to the PUC and the Division on a voluntary basis to assist the PUC with its decision-making in this proceeding. Disclosure of this information would impact the competitive position of these parties, and such disclosure would impede National Grid's future ability to obtain bids and/or this type of proprietary information..

In addition, the report prepared by Customized Energy Solutions in Attachment DIV 1-4 was prepared on behalf of Copenhagen Wind. Copenhagen Wind used this report to develop its annual curtailment estimate used in the submission of its bid. The Company requested that Copenhagen Wind provide a copy of this report. Disclosure of this report could impact the competitive position of Copenhagen Wind in the market, and would impede National Grid's ability to obtain the best price for future power purchase agreements.

Finally, the information regarding the ESAI forecast contained in Attachment DIV 1-3, Attachment DIV 1-8, and Attachment DIV 1-10 was developed by ESAI through its proprietary methods of analysis and was provided to National Grid on a confidential basis. National Grid is providing the un-redacted versions of Attachment DIV 1-8 and Attachment DIV 1-10, as well as a confidential CD-ROM as Attachment DIV 1-3 to the PUC and the Division on a voluntary basis to assist the PUC with its decision-making in this proceeding. Disclosure of this information could adversely affect ESAI's competitive position and would tend to make it less likely that such information would be provided voluntarily in the future. Moreover, such disclosure would impede National Grid's future ability to obtain this type of proprietary information from third-party consultants, or would increase the cost at which that information could be obtained.

### **III. CONCLUSION**

Accordingly, the Company requests that the PUC grant protective treatment to (i) the un-redacted versions of Attachment DIV 1-2-A, Attachment DIV 1-8, and Attachment DIV 1-10, (ii) the confidential CD-ROMs as Attachment DIV 1-2-B and Attachment DIV 1-3; and (iii) confidential Attachment DIV 1-4(c).

**WHEREFORE**, the Company respectfully requests that the PUC grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

**NATIONAL GRID**

By its attorney,

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Jennifer Brooks Hutchinson (RI Bar #6176)  
National Grid  
280 Melrose Street  
Providence, RI 02907  
(401) 784-7288

Dated: August 21, 2015

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4574  
In Re: Review of Power Purchase Agreement  
Between The Narragansett Electric Company and  
Copenhagen Wind Farm, LLC  
Responses to Division's First Set of Data Requests  
Issued on August 13, 2015

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Division 1-1

Request:

Please provide a complete copy of the Request for Proposals issued on July 1, 2014, including the price and non-price scoring criteria.

Response:

Please see Attachment DIV 1-1 for a complete copy of the Request for Proposals issued on July 1, 2014, including the price and non-price scoring criteria.

**REQUEST FOR PROPOSALS**

**FOR**

**LONG-TERM CONTRACTS FOR  
RENEWABLE ENERGY PROJECTS**

Issuance Date:

July 1, 2014

The Narragansett Electric Company d/b/a National Grid

**nationalgrid**

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## I. Introduction and Overview

### 1.1 Purpose of the Request for Proposals (“RFP”)

The Narragansett Electric Company d/b/a National Grid (“National Grid”), an investor-owned electric distribution company serving customers in the State of Rhode Island, is seeking proposals for the supply of electric capacity and energy and Renewable Energy Certificates and related attributes (including Certificates issued in the New England Power Pool Generation Information System) (collectively, “RECs”) from eligible renewable energy projects under long-term power purchase agreements (“PPAs” and individually a “PPA”) pursuant to Chapter 26.1 of Title 39 of the Rhode Island General Laws, entitled Long-Term Contracting Standard for Renewable Energy (the “Long-Term Contracting Standard”). In addition, National Grid is issuing this RFP in accordance with regulations (the “Regulations”) promulgated under Chapter 26.1 by the Rhode Island Public Utilities Commission (“PUC”), which became effective January 28, 2010. In this RFP, National Grid is soliciting capacity, energy and RECs from renewable energy capacity resources pursuant to PPAs with durations of 10-15 years. As of December 30, 2013, National Grid has executed contracts for approximately seventy-five percent (75 %) of the 90 MW minimum long-term contract capacity. As explained in Section 1.2, the law states that National Grid is not required to enter into contracts in excess of the remaining twenty-five percent (25%) of the minimum long-term contract capacity required under the Long-Term Contracting Standard or 22.5<sup>1</sup> MW in this solicitation, but may do so voluntarily, subject to PUC approval.<sup>2</sup> The terms of any PPAs will be finalized between National Grid and successful bidders based on the bids submitted and selected in accordance with the process set forth in this RFP.<sup>3</sup>

The fundamental purpose of the RFP is to satisfy the policy directives encompassed within the Long-Term Contracting Standard, which require National Grid to seek to develop commercially reasonable long-term contracts with developers or sponsors of newly developed renewable energy resources, with the goals of stabilizing long-term energy prices, enhancing environmental quality, creating jobs in Rhode Island, and facilitating the financing of renewable energy generation within the jurisdictional boundaries of the state or adjacent state or federal waters or providing direct economic benefit to the state.

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<sup>1</sup> Included in this amount will be any capacity contracted for through DG enrollments. The Company is required to contract for approximately 16 MW of distributed generation nameplate capacity by December 31, 2014, which is estimated to range between 2 MW to 6 MW of contract capacity, depending on the outcome of the enrollments.

<sup>2</sup> The statute defines minimum long-term contract capacity as 90 MW, of which; 10% (9 MW) must be distributed generation contract capacity pursuant to the Distributed Generation Standard Contracts Act, which became effective on June 29, 2011, inclusive of 3 MW of solar photovoltaic projects. See R.I.G.L. §39-26.2. Solar projects will not be precluded from the Long-Term Contracting Standard solicitation, and will be evaluated competitively with all other technology types. In determining whether the minimum long-term contract capacity has been reached, the capacity shall be adjusted by the capacity factor of each renewable energy resource.

<sup>3</sup> The actual amount of electric energy and RECs to be procured under this RFP will depend upon National Grid’s assessment of the bids submitted. The total amount of renewable resource capacity is the minimum long-term contract capacity of 90 MW (788,400 MWh/year), to be procured over four RFP processes conducted annually over a four year period beginning in July 2010. The amount procured in any given year may be reduced by procurements conducted under other provisions of the Long-Term Contracting Standard.

This RFP outlines the process that National Grid plans to follow to satisfy its obligations regarding the fourth of four solicitations required under the Long-Term Contracting Standard and the Regulations, sets forth timetables regarding the solicitation process, provides information and instructions to prospective bidders, and describes the bid-evaluation process that will be followed once bids are received.

## **1.2 Statutory Framework Established by The Long-Term Contracting Standard**

The Long-Term Contracting Standard requires that beginning on July 1, 2010, National Grid conduct four annual solicitations of proposals from renewable energy developers and, provided commercially reasonable<sup>4</sup> proposals have been received, enter into long-term contracts with terms of up to fifteen (15) years<sup>5</sup> for the purchase of capacity, energy and attributes from newly developed renewable energy resources. National Grid is not required to enter into long-term contracts that exceed the following four-year phased schedule:

By December 30, 2010: 25% of the minimum long-term contract capacity

By December 30, 2011: 50% of the minimum long-term contract capacity

By December 30, 2012: 75% of the minimum long-term contract capacity

By December 30, 2014: 100% of the minimum long-term contract capacity, but may do so earlier, subject to PUC approval.

As stated in the footnote on the first page of this RFP, the amount of energy and RECs procured in this solicitation will depend entirely on National Grid's evaluation of the bids submitted and National Grid's judgment whether there is value in selecting additional projects for the benefit of customers.

In addition, National Grid may, in its sole discretion, immediately, and from time to time, procure additional commercially reasonable contracts for newly developed renewable energy resources on an earlier timetable or above the minimum long-term contract capacity, subject to PUC approval. This procurement process may include individual negotiations.

In addition, in accordance with the Distribution Generation Standard Contracts Act, National Grid is required to enter into standard contracts for an aggregate nameplate capacity of 40 MW of distributed

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<sup>4</sup> "Commercially reasonable" means terms and pricing that are reasonably consistent with what an experienced power market analyst would expect to see in transactions involving newly developed renewable energy resources. Commercially reasonable also includes having a credible project operation date, but a project need not have completed the requisite permitting process to be considered commercially reasonable. The Regulations have defined credible operation date to mean that a project is more likely than not to come on line within ninety (90) days of that which is projected as evidenced by documentation filed by the renewable energy developer in the response to this RFP.

<sup>5</sup> National Grid may enter into contracts for term lengths longer than fifteen (15) years, subject to PUC approval.

generation projects<sup>6</sup> by the end of 2014 to be spread over four years. National Grid is required to procure these contracts under a separate and distinct solicitation and enrollment program pursuant to the provisions of the new law. While bids received as part of this RFP may also qualify as a “distributed generation project”, this RFP is specifically to solicit proposals under the Long-Term Contracting Standard.

To be eligible under this RFP, a generator must be a “newly developed renewable energy resource” under the Long-Term Contracting Standard and the Regulations. A “newly developed renewable resource” is defined as electric generation units that use exclusively an eligible renewable energy resource (as defined under R.I.G.L. § 39-26-5 and Section 5 of the Rules and Regulations governing the Implementation of a Renewable Energy Standard, effective July 25, 2007, promulgated under R.I.G.L. §39-26-5), and that have neither begun operation, nor have the developers of the units implemented investment or lending arrangements necessary to finance the construction of the unit; provided, however, that any such projects located within the State of Rhode Island that have obtained project financing on or after January 1, 2009 shall also qualify under this RFP.

In determining whether National Grid has satisfied the minimum long-term contract capacity requirement under the Long-Term Contracting Standard, the nameplate capacity under contract shall be adjusted by the capacity factor of each renewable generator as determined by the ISO New England (“ISO-NE”) rules. For this RFP, and for future solicitations, the annual net capacity factor shall be used. This is the projected annual net (alternating current) electric output of the facility, divided by the product of the maximum net hourly output of the facility and 8760 hours/year.

All approved projects, regardless of their location, must provide other direct economic benefits to the State of Rhode Island, such as job creation, increased property tax revenues, or other similar revenues deemed substantial by the PUC as determined on a case-by-case basis.

In summary, the following requirements must be met for approval of a PPA by the PUC.

- (a) the project must be qualified as a “newly developed renewable energy resource,”
- (b) the PPA must be commercially reasonable,
- (c) the project must provide direct economic benefits to Rhode Island, such as job creation or tax revenues.

### **1.3 Procurement Process and Bid Evaluation Approach**

The procurement process is designed to have three stages of evaluation, as described in Section 2.1 of the RFP. Initially, bids will be evaluated on the basis of whether certain eligibility and threshold requirements are satisfied. Eligibility requirements are designed to ensure that the bids under review offer the appropriate product and PPA tenor from qualifying newly developed renewable energy resources. Threshold requirements are designed to ensure that proposed projects satisfy statutory

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<sup>6</sup>Distributed generation projects are defined as those having a nameplate capacity of 5 MW or less. The Distributed Generation Standard Contracts Act also contains a provision which provides for a combination of such contracts with net metering

criteria under the Long-Term Contracting Standard and meet minimum standards for viability. In the second stage, bids will be evaluated in a technology-neutral manner based on specified price and non-price evaluation criteria. This portion of the bid evaluation will be quantitative in nature (i.e., a quantitative scoring system will be utilized). Projects that pass the eligibility and threshold review and that are scored favorably in the second stage of the evaluation process will advance to the final stage of the evaluation process. At this third stage of the process, further evaluation of the remaining bids will be conducted on matters pertaining to project viability and the extent to which the bids, individually and as a portfolio, achieve a variety of objectives, including cost effectiveness and diversity of resources. National Grid will select bids for PPA consideration and negotiation from this pool. All three stages of the evaluation process, including the pertinent criteria, are described in Section II of this RFP.

#### **1.4 Communications between National Grid and Bidders**

With the exception of the pre-bid conference (see Section III, Paragraph 3.1 below), all pre-bid contact with prospective bidders and other interested parties will be via email and the National Grid energy procurement website. Questions should be submitted by email as indicated in Section III, Paragraph 3.5 of this RFP, and responses will be posted to the website. Bids will be submitted to National Grid at the address set forth in Section III, Paragraph 3.5 of this RFP.

Following submission of bids, it will be the responsibility of the bidders to keep National Grid informed of any changes in the status of their bids. This responsibility is applicable until such time as each bidder has been notified that the bid has been shortlisted or not shortlisted. National Grid will retain the right to seek additional information from any bidder, as well as to negotiate modified pricing before a final contract is developed.

#### **1.5 RFP Process**

The timeline for the bidding process following the issuance of this RFP, as well as the schedule for other steps in the process including approval by the PUC, is set forth below at Section 3.1.

## **II. Bid Evaluation and Selection Criteria and Process**

### **2.1 Overview of Bid Evaluation and Selection Process**

Once bids are received by National Grid, the proposals will be subject to a consistent and defined review, evaluation and short-list selection process. The first stage consists of a review of whether the bids satisfy specified eligibility, threshold and other minimum requirements set forth in Section 2.2 of this RFP. The second stage consists of a combined price and non-price evaluation of bids that pass the first stage review, as described in Section 2.3 of this RFP. Bids that are selected for further review will enter a final stage of review which will involve additional risk assessment and consideration of the bids from a portfolio perspective consistent with the criteria set forth in Section 2.4 of this RFP.

Subsequent to the selection of the short list, National Grid will conduct any additional evaluation as required, select bids for contract negotiations, and will file any and all executed contracts for review

and approval by the PUC. This post-short list selection stage of the process is described in Section 2.5 of this RFP.

## **2.2 Eligibility, Threshold and Other Minimum Requirements—Stage One of the Evaluation Process**

### **2.2.1 Introduction**

In order for a bid to qualify for detailed evaluation, it must satisfy certain requirements pursuant to this RFP. These requirements pertain to eligibility, a variety of threshold requirements and other requirements pertaining to participation in this RFP, including bidder certifications and allowable pricing. Following receipt of the bids, the bids will be reviewed to determine whether they satisfy these minimum requirements. Bids that do not satisfy these Stage One requirements may be disqualified from further review and evaluation.<sup>7</sup> Stage One requirements are set forth in the following section of this RFP.

### **2.2.2 Eligibility Requirements**

All proposals must meet the following eligibility requirements set forth below. Specifically, proposals will be considered from an “Eligible Bidder” with respect to “Eligible Products” generated from an “Eligible Facility.” The Eligible Products must be offered over the “Allowable Contract Term” in quantities that are equal or greater than the “Minimum Contract Size.” Failure to meet any of these requirements will lead to disqualification of the proposal from further review and evaluation.

#### **2.2.2.1 Eligible Bidder**

An Eligible Bidder is the owner of an Eligible Facility or of the development rights to an Eligible Facility, i.e., the developer of the Eligible Facility.

#### **2.2.2.2 Eligible Facility**

An Eligible Facility must be an electric generation facility that satisfies each of the following standards:

- a. The electric generation facility must qualify as an eligible renewable energy resource as defined R.I.G.L. § 39-26-5 and Section 5 of the PUC Regulations governing the Implementation of a Renewable Energy Standard, effective July 25, 2007, promulgated under R.I.G.L. §39-26-5.
- b. The facility must qualify as a newly developed renewable energy resource as defined in R.I.G.L. §39-26.1-2(6). The generation units must not have begun operation, nor have the developers implemented investment or lending arrangements to finance construction;

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<sup>7</sup>National Grid may conduct additional evaluation on bids at its discretion before the Stage One evaluation is completed.

provided, however, that any projects located within the state of Rhode Island which obtain project financing on or after January 1, 2009 shall qualify for this initial solicitation..

- c. All projects, regardless of their location, shall provide other direct economic benefits to the State of Rhode Island, such as job creation, increased property tax revenues, or other similar revenues, or pricing benefits.

### **2.2.2.3 Eligible Products**

An Eligible Bidder must propose to sell electric capacity, energy and RECs from an Eligible Facility under a PPA. The structure of the contract must be both unit-specific and unit-contingent. With respect to electric capacity, the Eligible Bidder must propose a means of addressing the sale of that capacity within the context of the ISO-NE Forward Capacity Market.<sup>8</sup>

### **2.2.2.4 Allowable Contract Term**

Consistent with the definition of long-term contract in Section 3 of the Regulations, an Eligible Bidder may submit a proposal for the sale of Eligible Products from an Eligible Facility for a term of 10 to 15 years, at the bidder's discretion. Contract terms may be greater than fifteen (15) years upon approval of the PUC. Bidders seeking contract terms longer than 15 years must demonstrate why the longer contract term is appropriate, and must submit pricing schedules for both 15 years and for the longer term. The two pricing schedules will be used to evaluate any economic justification for the longer term.

### **2.2.2.5 Minimum Contract Size**

The Minimum Contract Size is the proposed sale of Eligible Products from all or a portion of the net generating capability of an Eligible Facility at a specific site that is, at a minimum, one (1) MW.<sup>9</sup> A bidder may bid the capacity and the entire production of energy and RECs from its proposed Eligible Facility, or from any portion of its proposed Eligible Facility. The contract capacity under this RFP shall be determined by the product of the maximum net generating capability of the unit(s) and the expected annual capacity factor. Under this RFP, there is not a maximum contract size *per se*. However, National Grid may be constrained in light of the objective of this particular RFP process (as described above), and 90 MW total over four solicitations.

A minimum contract size of 250 kW is acceptable for solar projects only.

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<sup>8</sup> For the sale of RECs only from projects that intend to take advantage of net metering, those projects are now governed by the Net Metering provision of the Renewable Energy Standard, R.I.G.L. § 39-26.4-1 *et seq*, which took effect on June 29, 2011 and contains specific provisions for the installation of customer-sited, grid-connected renewable energy generation by an eligible net metering system.

<sup>9</sup> The minimum project size as defined here is the maximum net output (alternating current) in MWh per hour. Note that this rating differs from renewable capacity as defined in the Long-Term Contracting Standard and in the Regulations, which account for capacity factor in the determination of contract capacity.

## 2.2.3 Threshold Requirements

### 2.2.3.1 Introduction

Bids that meet all the Eligibility Requirements will be evaluated to determine compliance with threshold requirements, which have been designed to screen out proposals that are insufficiently mature from a project development perspective; lack technical viability; impose unacceptable financial accounting consequences for National Grid; are not in compliance with RFP requirements pertaining to credit support, or fail to satisfy minimum standards for bidder experience and ability to finance the proposed project. The threshold requirements for this RFP are set forth below.

### 2.2.3.2 Reasonable Project Schedule

National Grid is interested in projects that can demonstrate the ability to develop, permit, finance, and construct the proposed Eligible Facility within a reasonably proximate time. To that end, Eligible Bidders must provide a reasonable schedule that provides for *both* of the following:

- a. Closing of construction financing and commencement of construction – **Two years** after contract execution date; and
- b. Commercial Operation Date – **Five years** after contract execution date.

An exception to the above is that solar projects should have schedules that provide for commercial operation within **two years**.

The Regulations specifically define the term credible operation date, which means that a project is more likely than not to come on line within ninety (90) days of that which is projected, as evidenced by documents filed by a bidder showing, at a minimum, the following:

- commencement of permitting processes
- a plan for completing all permitting processes
- viable resource assessment or fuel supply plans and agreements
- viable financing plans
- viable installation and electrical interconnect plans
- material progress toward acquisition of real property rights
- evidence of material vendor activity

Other considerations for establishing a credible operation date that are noted in the Regulations include:

- developer experience in completing similar projects by proposed dates
- track record and state of development of the particular technology being proposed
- assignment of an ISO-NE interconnection queue position
- developer's ability to secure financing necessary to complete the project by the proposed date

A proposal that does not have a reasonable schedule that provides sufficient time for the application for, and receipt of, necessary permits and approvals may be determined not to have satisfied this threshold requirement. In addition, a proposal that is determined to have a “fatal flaw” such that it will be unable to obtain permits or property rights necessary to finance and construct the proposed project may be determined not to have satisfied this threshold requirement.

### **2.2.3.3 Site Control**

The bidder must demonstrate that it has control or a right to acquire control over a site for its proposed project. To meet this threshold requirement, bidders must either provide documentation showing that they own the site or have a lease or other property rights with respect to the site on which the proposed project will be located; have an option agreement to purchase or lease the site, or at a minimum have negotiated a letter of intent for control of the site. Bidders that only have a letter of intent for the site at the time of bid submission may be required to obtain a binding site control agreement at a later time prior to execution of a PPA (which may include an option to purchase or an option to lease). Site control for offshore wind projects or projects on state lands will be evaluated based on the particular submissions of bidders and the extent to which they can demonstrate a high likelihood that they will be able to obtain the necessary rights to construct and operate the proposed project, including the real property rights associated with the interconnecting facilities from the proposed project to the transmission grid or local distribution facilities.

### **2.2.3.4 Technical Viability; Ability to Finance the Proposed Project**

The bidder must demonstrate that the technology it proposes to use is technically viable and that the bidder has the ability to finance the proposed project. Technical viability may be demonstrated by showing that the technology is commercially available and has been used successfully. If a bidder plans to use technology that is not commercially proven, it must provide evidence of technical viability and a credible plan to finance the project in light of the state of development of the technology. All bidders must provide a reasonable plan for financing the proposed project, including the funding of development costs and the required development period security and the ability to acquire the required equipment in the time frame proposed.

### **2.2.3.5 Experience**

The bidder must demonstrate that it has a sufficient amount of relevant experience to successfully develop, finance, construct and operate its proposed project. This demonstration can be made by showing that the bidder (or a substantial member of the bidder’s development team) has:

- a. Successfully developed a similar type of project by a proposed commercial operation date;  
OR
- b. Successfully developed one or more projects of different technologies but of similar size or complexity or requiring similar skill sets by a proposed commercial operation date; AND

- c. Experience in financing power generation projects.

### **2.2.3.6 Direct Economic Benefits to Rhode Island**

The Long-Term Contracting Standard requires that projects, regardless of their location, shall provide other direct economic benefits to the State of Rhode Island, such as job creation, increased property tax revenues, or other similar revenues. This threshold requirement can be satisfied by a showing of:

- a. Direct employment benefits associated with the proposed project;
- b. Indirect employment benefits associated with the proposed project;
- c. Increased property tax revenues or other similar revenues.

For projects not located in Rhode Island, the benefits of cost savings for Rhode Island customers resulting from competitive pricing will be considered. National Grid will be required to conduct an analysis of the respective economic benefits in relation to costs under the PPA.

### **2.2.3.7 Security Requirements**

Bidders will be required to post Development Period Security and Operating Period Security. The required level of Development Period Security is a \$30 per kW Development Period Security Amount multiplied by (a) the proposed project's nameplate capacity (in kW) if the entire output of the proposed project is proposed to be sold under this RFP or (b) the percentage of the proposed project's output that is proposed to be sold under this RFP multiplied by the project's nameplate capacity.<sup>10</sup> Fifty percent (50%) of the Development Period Security must be provided upon execution of the PPA. The remaining fifty percent (50%) of the Development Period Security must be provided upon PUC approval of the PPA. Any posted Development Period Security will be promptly returned if the PUC does not approve the PPA. Once a project achieves Commercial Operation, the amount of required security (Operating Period Security) will be the same as the required amount of Development Period Security.

The required security must be in the form of a cash deposit or a letter of credit.

### **2.2.3.8 Commercially Reasonable Standard**

Under the Long-Term Contracting Standard, National Grid is not obligated to enter into long-term contracts for renewable energy resources on terms which National Grid believes to be commercially unreasonable. National Grid will consider both the pricing schedule and non-price terms and conditions in an initial assessment of whether a proposal is commercially reasonable, which is defined in Section 39-26.1-2(1) of the Long-Term Contracting Standard as having "terms and pricing that are reasonably consistent with what an experienced power market analyst would expect to see in transactions involving new developed renewable energy resources."

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<sup>10</sup> For projects that have significant auxiliary loads, net generating capacity may be used in lieu of nameplate capacity. Note that this rating is not the same as renewable capacity as defined in the Long-Term Contracting Standard, and in the Regulations, which account for capacity factor in the determination of contract capacity.

### **2.2.3.9 Timeliness**

The bid submitted must be timely submitted in accordance with Sections 3.1 and 3.8 of this RFP.

### **2.2.4 Other Minimum Requirements**

Other RFP requirements pertain to bid certification, allowable pricing and bid completeness, as described in this section.

#### **2.2.4.1 Proposal Certification**

Bidders are required to provide firm pricing for 120 days from the date of bid submission. The bidder must also sign the certification form in Appendix B verifying that the prices, terms and conditions of the proposal are valid for at least 120 days. An officer or duly authorized representative of the bidder is required to sign the Proposal Certification Form.

#### **2.2.4.2 Allowable Forms of Pricing**

National Grid will accept proposals from renewable resources for capacity, energy and renewable attributes that offer one or a combination of the following pricing options:

- (1) a fixed bundled energy price (in \$/MWh), with separate pricing for capacity (\$/kW-month), energy(\$/MWh) and RECs (\$/REC) for the term of the contract;
- (2) prices for bundled energy and for capacity, energy and RECs (in \$/MWh, \$/kW-month and \$/REC, respectively) that change by a fixed rate for the term of the contract (e.g. 2% increase per year); or by different fixed rates for various periods of the contract (e.g. 3% increase for the first 5 years, 2% for the next 5 years, etc.);
- (3) an indexed price for bundled energy and for capacity, energy and RECs (in \$/MWh, \$/kW-month and/or \$/REC, respectively) based on a published, publicly available inflation-related index that reflects actual project costs for a portion of the costs of the project (e.g., operating and maintenance costs); provided, that the index must be used in a symmetrical manner (i.e., it must allow for both price increases and decreases depending on whether the pertinent index increases or decreases in value, and prices with a floor must also have a symmetrical ceiling).<sup>11</sup>
- (4) Proposed prices may neither be conditioned upon nor subject to adjustment based upon the availability of the Federal Production Tax Credit or the Federal Investment Tax Credit, or the availability or receipt of any other government grant or subsidy.

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<sup>11</sup> Installed capacity must qualify under ISO-NE rules and the Bidder's proposal conforms with the ISO-NE market rules for its Forward Capacity Market and must not require National Grid to be the Lead Market Participant for the bidder's generating unit.

(5) Recent ISO-NE Market Rule changes will enable Market Participants to submit negative offers as low as negative \$150/MWh (see “ISO New England Inc. and New England Power Pool, Docket No. ER13-1877-000, Energy Market Offer Flexibility Changes”, filed July 1, 2013). Bidders are required to develop their pricing proposal in contemplation of a payment adjustment to compensate National Grid for any energy delivered at negative market clearing prices at the delivery node. In the event that the Locational Marginal Price ("LMP") for the Energy at the Delivery Point is less than \$0.00 per MWh in any hour, the PPA price for Energy purchased during that hour will be reduced by the amount by which that LMP is below \$0.00/MWh.

Examples:

If Delivered Energy equals 1 MWh and Contract Price equals \$50.00/MWh:

Hourly LMP at the Delivery Point equals (or is greater than) \$0.00/MWh

Buyer payment of Price to Seller = \$50.00/MWh

Seller credit/reimbursement for negative LMP to Buyer = \$0.00

Net Result: Buyer pays Seller \$50/MWh for that hour

Hourly LMP at the Delivery Point equals -\$150.00/MWh

Buyer payment of Price to Seller = \$50.00

Seller credit/reimbursement for negative LMP to Buyer = \$150.00/MWh

Net Result: Seller credits or reimburses Buyer: \$150/MWh - \$50/MWh = \$100/MWh for that hour

These forms of pricing are conforming under this RFP. National Grid may consider other forms of pricing as an alternative as long as the bidder submits a proposal for the project with conforming pricing. Alternative (non-conforming) pricing may be considered subject to the following conditions:

- Any pricing formula must be symmetrical—in other words, if an index is to be utilized, prices must be allowed to increase or decrease in a symmetrical manner relative to a base price;
- There must be a price cap for each year under the proposed contract.

National Grid is under no obligation to accept any form of alternative (non-conforming) pricing.

The Delivery Point for electric energy must be (a) at an ISO-NE Pool Transmission Facility node or (b) a point on the local distribution system for smaller projects. For projects not located in Rhode Island, National Grid may also require pricing based on the Rhode Island zone.

With respect to any pricing proposal, payments will only be made for Products delivered.

### **2.2.4.3 Bid Completeness: Bidder Response Forms**

Bidders must use the forms provided in Appendix B and provide complete responses. Appendix B contains the Bidder Response Forms which outline the information required from each bidder. Bidders are required to provide the information requested in each section of the Bidder Response Forms. If any of the information requested is inconsistent with the type of technology or product proposed, the Bidder should include “N/A” and describe the basis for this designation. If a bidder does not have the information requested in the bid forms and cannot obtain access to that information prior to the bid submittal due date, the bidder should provide an appropriate explanation.

## **2.3 Second Stage Evaluation – Price and Non-Price Analysis**

Proposals that meet the requirements of the first stage review will then be subject to an initial price and non-price analysis. The results of the price and non-price analysis will be a relative ranking and scoring of all proposals. National Grid plans to weight price factors at eighty percent (80%) and non-price factors at twenty percent (20%) for purposes of conducting the initial evaluation.

### **2.3.1 Initial Evaluation Using Price-Related Evaluation Criteria**

The price evaluation will be based on a comparison of (a) the total cost of the products bid, which must include capacity, energy, RECs, to (b) the estimated market value of these products, taking into consideration the production profile and location of the proposed project over the term of the proposed bid (10-15 years) and any locational marginal price benefits. National Grid plans to use a price forecast that will incorporate the effects of future federal regulation of carbon dioxide emissions on relevant energy prices. The metric used will be net \$/MWh cost or benefit. Each bidder will be responsible for all costs associated with interconnecting its project to the transmission grid or, if applicable, local distribution facilities. Each bidder will identify in its bids its proposed point of delivery.

As part of the price evaluation, National Grid will assess the relative above-market or below-market costs during the beginning, middle and end years of the proposed contract bid in order to assess the relative front-loading or back-loading of the proposed bid. Other things being equal, bids that have front-loaded above-market costs will not be evaluated as favorably as other bids.

Proposals will be ranked from highest to lowest net benefit (or lowest to highest net cost) on a dollars per MWh basis based on the result derived through the application of the methodology described above (including consideration for front-loading/back-loading).

### **2.3.2 Initial Non-Price Evaluation**

The non-price evaluation will consist of five overall categories: (1) siting and permitting; (2) project development status and operational viability; (3) experience and capabilities of bidder and the project development team; (4) assignment of an ISO-NE queue position, if required; and (5) financing. Within each category are a number of related criteria that will be considered in the evaluation. This

section of the RFP will identify and describe in more detail the individual criteria within each primary category. The relative importance of each of the criteria in terms of the scoring of the bids will be developed prior to receipt of bids and will be utilized during the bid evaluation process.

### **2.3.2.1 Purpose of Non-Price Evaluation Criteria**

The non-price evaluation criteria other than contract exceptions are designed to assess the likelihood of a project coming to fruition based on various factors critical to successful project development. The objectives of the criteria are to provide an indication of the feasibility and viability of each project and the likelihood of meeting the proposed commercial operation date. Proposals are preferred that can demonstrate, based on the current status of project development and past experience, that the project will likely be successfully developed and operated as proposed.

### **2.3.2.2 Factors to be Assessed in Non-Price Evaluation**

Within each of the five non-price evaluation factors, a variety of project and proposal-related factors will be assessed. They are summarized as follows:

- Siting and permitting
  - Extent to which site control has been achieved, including acquisition of necessary easements or rights-of-way
  - Identification of required permits and approvals
  - Status of efforts and credibility of plan to obtain permits and approvals
  - Community relations plan
- Project development status and operational viability
  - Completeness and credibility of detailed critical path schedule; ability to meet scheduled construction start date and commercial operation date
  - Credibility of fuel supply plans or energy resource assessments
  - Reliability and state of development of proposed technology
  - Commercial access to proposed technology
  - Progress in interconnection process
- Experience and capabilities of bidder and project development team
  - Project development
  - Project financing
  - Operations and maintenance
  - Experience in the ISO-NE market
- Assignment of an ISO-NE queue position, if required
  - Status of interconnection and system impact studies
  - Likelihood that interconnection process will be completed in accordance with schedule for project development
- Financing
  - Credibility of financing plan
  - Financial strength of bidder

## **2.4 Third Stage Evaluation; Selection of the Initial Short List**

Following the total price and non-price rankings conducted in the second evaluation stage, a further review<sup>12</sup> of the bids will be conducted and a short list selected. In this third stage of the evaluation (and in selecting the short list), National Grid will consider and weight at its discretion the following factors:

- Ranking in the second stage evaluation;
- Commercial reasonableness of the bids;
- Risk associated with project viability of the bids;
- The extent to which additional employment or other economic benefits would be created within Rhode Island;
- Portfolio effect: the value of diversity of resources—by size and type of resources.

National Grid believes that a third stage evaluation process that uses the second stage evaluation as a guide and provides for a reasonable degree of considered judgment based on criteria specified in this RFP will provide greater assurance that the RFP will lead to successful results.

The objective of the third stage of evaluation is to select the proposal(s) which provide the greatest value consistent with the stated objectives and requirements as set forth in the RFP. Generally, National Grid prefers viable projects that provide low cost renewable energy with limited risk and some degree of resource diversity. However, it is recognized that any particular project may not be ranked highly with respect to all of these considerations and the extent to which the stated RFP objectives will be satisfied will depend, in large part, on the particulars of the proposals that are submitted.

## **2.5 Contract Negotiation Process**

Bidders selected for negotiations by National Grid will be required to indicate in writing whether they intend to proceed with their proposals within five business days of being notified. As basis for negotiation, bidders will be provided with a PPA appropriate for the particular project.

## **2.6 Regulatory Approval**

Once National Grid has executed a PPA as a result of this RFP process, the proposed PPA will be submitted to the PUC for review and approval within thirty (30) days of execution. The PUC shall hold public hearings to review the PPA within forty-five (45) days of the filing and issue a written order approving or rejecting the PPA within sixty (60) days. The PUC will approve the PPA if it determined that

- (1) the PPA is commercially reasonable,

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<sup>12</sup> In connection with this review, and in evaluation of the pricing, a bidder may be asked to provide pro forma income and cash flow statements for the term of the proposed PPA (including revenue and cost data by major categories, debt service, depreciation expense and other relevant information).

- (2) the requirements for the annual solicitation have been met; and
- (3) the proposed PPA is consistent with the purposes of the Long-Term Contracting Standard and the Regulations.

All PPAs shall contain provisions which allow National Grid to terminate the PPA, without penalty, after three (3) years of execution should National Grid or the PUC determine that material progress on the project is not being made, as determined by evaluating the success in meeting PPA milestones.

National Grid is not obligated to execute any PPA on terms which it reasonably believes to be commercially unreasonable. If there is a dispute about whether these terms are commercially unreasonable, the PUC shall make the final determination after an evidentiary hearing.

No PPA will be effective unless and until it is approved by the PUC.

### **III. Instructions to Bidders**

#### **3.1 Schedule for the Bidding Process**

The proposed schedule for the bidding process is set forth in Chart 1. National Grid reserves the right to revise the schedule as necessary. Any changes to the schedule will be posted on the website for this RFP.

**Chart 1**

**RFP Schedule**

<b>Event</b>	<b>Anticipated Dates</b>
Issue RFP	July 1, 2014
Bidders Conference	July 15, 2014
Submit Notice of Intent to Bid	July 18, 2014
Deadline for Submission of Questions	July 18, 2014
Due Date for Submission of Proposals	August 5, 2014
Review of Bids with Division	August 12, 2014
Selection of Short-Listed Bidders	October 20, 2014
Negotiate and Execute Contracts	December 5, 2014
Submit Contracts for PUC Approval	January 5, 2015

#### **3.2 Bidders Conference; Bidder Questions; Notice of Intent to Bid**

A Bidders Conference will be held for interested persons approximately two (2) weeks after the final RFP document is posted on the RFP website. The purpose of the Bidders Conference is to provide the opportunity to clarify any aspects of the RFP. Prospective bidders may submit questions about

the RFP prior to the Bidders Conference. National Grid will attempt to answer questions submitted prior to and during the Bidders Conference. Although National Grid may respond orally to questions posed at the Bidders Conference, only written answers that are provided in response to written questions will be official responses.

National Grid will also accept written questions pertaining to the RFP following the Bidders Conference up to the date provided in Chart 1. Both the questions and the written responses will be posted on the National Grid website (without identifying the person that asked the question).

Prospective bidders are also encouraged to submit a Notice of Intent to Bid form within seventeen (17) days of issuance of the RFP. The Notice of Intent to Bid form is attached as Appendix A to the RFP. National Grid will provide any necessary updates by email regarding the RFP to prospective bidders who submit a Notice of Intent to Bid. Persons that submit a Notice of Intent to Bid are not obligated to submit a proposal.

### **3.3 Preparation of Proposals**

Each bidder shall have sole responsibility for carefully reviewing the RFP and all attachments and for thoroughly investigating and informing itself with respect to all matters pertinent to this RFP and its proposal, including pertinent ISO-NE tariffs and documents. Bidders should rely only on information provided in the RFP and any associated written updates when preparing their proposal. Each bidder shall be solely responsible for and shall bear all of its costs incurred in the preparation of its proposal and/or its participation in this RFP.

### **3.4 Submission of Proposals; Confidentiality**

Bidders must submit one (1) original in a loose leaf binder and one (1) bound copy of their proposal as well as three (3) CDs with the entire contents of the proposal to the Official Contact. Bids must be submitted by 5:00 p.m. eastern prevailing time on the due date for proposals set forth in Section 3.1. Fax or email submissions will not be accepted. National Grid shall reject all proposals received after the deadline.

Each proposal shall contain the full name and business address of the bidder and bidder's contact person and shall be signed by an authorized officer of the bidder. Bidders may sign the original proposal and include a copy of the signature page with the remaining proposal.

Bidders must clearly identify all confidential information in their Proposals. However, bidders should take care to designate as confidential only those portions of their Proposals that genuinely warrant confidential treatment. The practice of marking each and every page of a Proposal as "confidential" is discouraged.

National Grid agrees to use commercially reasonable efforts to treat the non-public information it receives from bidders in a confidential manner and will not, except as required by law or in a regulatory proceeding, disclose such information to any third party or use such information for any purpose other than in connection with this RFP; provided, that, in any regulatory, administrative or jurisdictional proceeding in which confidential information is sought, National Grid shall take reasonable steps to limit disclosure and use of said confidential information through the use of non-disclosure agreements or orders seeking protective treatment, and shall inform the bidders if

confidential information is being sought. Notwithstanding the foregoing, in any regulatory proceeding in which such confidential information is sought and a request for confidential treatment is made to the PUC, National Grid shall not be responsible in the event that it is determined that the request for treating information in a confidential manner is not warranted. The bidders shall be required to use commercially reasonable efforts to treat all information received from National Grid in a confidential manner and will not, except as required by law or in a regulatory proceeding, disclose such information to any third party.

### **3.5 Official Contact for the RFP; Other Contact Persons**

All copies of the proposal should be sent to the attention of the Official Contact for National Grid for which a proposal is being made at the address listed below:

Corinne DiDomenico  
Manager, Environmental Transactions  
Energy Procurement  
National Grid  
100 East Old Country Road  
Hicksville, NY 11801  
(516) 545-5435

Any questions regarding the RFP should be sent to the Official Contact at following email address: [corinne.didomenico@nationalgrid.com](mailto:corinne.didomenico@nationalgrid.com). The following recipients should be sent copies by email of such comments or questions:

James Calandra, [james.calandra@nationalgrid.com](mailto:james.calandra@nationalgrid.com)  
Renewable Contracts, [renewablecontracts@nationalgrid.com](mailto:renewablecontracts@nationalgrid.com)

### **3.6 Organization of the Proposal**

Bidders are required to organize their proposal consistent with the contents of the Response Package in Appendix B. The organization and contents of the proposal should be organized as follows:

1. Proposal Certification Form
2. Proposal Summary/Contact Information
3. Executive Summary
4. Pricing Information and Schedules
5. Project Operational Parameters
6. Energy Resource Plan
7. Financial/Legal
8. Siting and Interconnection
9. Environmental Assessment and Permit Acquisition Plan
10. Engineering and Technology
11. Operations and Maintenance
12. Project Schedule
13. Project Management/Experience
14. Alternatives
15. Direct Economic Benefits to Rhode Island

### **3.7 Modification or Cancellation of the RFP and Solicitation Process**

Following the submission of bids, National Grid may request additional information from Bidders at any time during the process. Bidders that are not responsive to such information requests may be eliminated from further consideration. Unless otherwise prohibited, National Grid may, at any time up to final award, postpone, withdraw and/or cancel this RFP; alter, extend or cancel any due date; and/or, alter, amend, withdraw and/or cancel any requirement, term or condition of this RFP, any and all of which shall be without any liability to National Grid.

By submitting a bid, a bidder agrees that the sole recourse that it may have with respect to the conduct of this RFP is by submission of a complaint or similar filing to the PUC in a relevant docket pertaining to this RFP.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4574  
In Re: Review of Power Purchase Agreement  
Between The Narragansett Electric Company and  
Copenhagen Wind Farm, LLC  
Responses to Division's First Set of Data Requests  
Issued on August 13, 2015

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Division 1-2

Request:

Please provide the detailed scoring for each proposal.

Response:

Please see Confidential Attachment DIV 1-2-A for the non-price scores. Pursuant to Commission Rule 1.2(g), the Company is seeking confidential treatment of certain bidder evaluation information contained in Attachment DIV 1-2-A. The Company is providing a redacted version of Attachment DIV 1-2-A for the public filing.

Please see Confidential Attachment DIV 1-2-B for the live spreadsheets calculating the price scores, which the Company is providing on the enclosed CD-ROM. Because the information contained in the MS Excel spreadsheet contains confidential and proprietary information, the Company is seeking protective treatment of this CD-ROM pursuant to Commission Rule 1.2(g).

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project			
Evaluation Factors	Max Points	Rating	Criteria Considered in Each Project
Siting and Permitting			Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways Identification of required permits and approvals and status of plan to obtain permits and approvals Community relations plan
<i>Subtotal</i>			
Project Development Status and Operational Viability			Reasonableness of critical path schedule and demonstrated ability to meet major milestones Credibility of fuel resource plan Commercial access to and reliability of the proposed technology Progress in interconnection process
<i>Subtotal</i>			
Experience and Capability of Bidder and Project Team			Project development experience Project financing experience Operations and maintenance experience Experience in ISO-NE market
Financing			Credibility of the financing plan Financial strength of the bidder
Economic Benefit			Direct Employment Indirect Employment Tax Revenues
<b>Total</b>	<b>20.0</b>		

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project				
Evaluation Factors	Max Points	Rating		
Siting and Permitting				
				Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways
				Identification of required permits and approvals and status of plan to obtain permits and approvals
				Community relations plan
<i>Subtotal</i>				
Project Development Status and Operational Viability				
				Reasonableness of critical path schedule and demonstrated ability to meet major milestones
				Credibility of fuel resource plan
				Commercial access to and reliability of the proposed technology
				Progress in interconnection process
<i>Subtotal</i>				
Experience and Capability of Bidder and Project Team				
		Project development experience		
		Project financing experience		
		Operations and maintenance experience		
		Experience in ISO-NE market		
Financing				
		Credibility of the financing plan		
		Financial strength of the bidder		
Economic Benefit				
		Direct Employment		
		Indirect Employment		
		Tax Revenues		
<b>Total</b>	<b>20.0</b>			

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project			Criteria Considered in Each Project	
Evaluation Factors	Max Points	Rating		
Siting and Permitting	20.0		Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways	
			Identification of required permits and approvals and status of plan to obtain permits and approvals	
			Community relations plan	
<i>Subtotal</i>				
Project Development Status and Operational Viability				Reasonableness of critical path schedule and demonstrated ability to meet major milestones
				Credibility of fuel resource plan
				Commercial access to and reliability of the proposed technology
				Progress in interconnection process
<i>Subtotal</i>				
Experience and Capability of Bidder and Project Team				Project development experience Project financing experience Operations and maintenance experience Experience in ISO-NE market
Financing				Credibility of the financing plan Financial strength of the bidder
Economic Benefit				Direct Employment Indirect Employment Tax Revenues
<b>Total</b>		<b>20.0</b>		

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project			
Evaluation Factors	Max Points	Rating	Criteria Considered in Each Project
Siting and Permitting			Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways
			Identification of required permits and approvals and status of plan to obtain permits and approvals
			Community relations plan
<i>Subtotal</i>			
Project Development Status and Operational Viability			Reasonableness of critical path schedule and demonstrated ability to meet major milestones
			Credibility of fuel resource plan
			Commercial access to and reliability of the proposed technology
			Progress in interconnection process
<i>Subtotal</i>			
Experience and Capability of Bidder and Project Team			Project development experience
			Project financing experience
			Operations and maintenance experience
			Experience in ISO-NE market
Financing			Credibility of the financing plan
			Financial strength of the bidder
Economic Benefit			Direct Employment
			Indirect Employment
			Tax Revenues
<b>Total</b>	<b>20.0</b>		

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project			
Evaluation Factors	Max Points	Rating	Criteria Considered in Each Project
Siting and Permitting			Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways
			Identification of required permits and approvals and status of plan to obtain permits and approvals
			Community relations plan
<i>Subtotal</i>			
Project Development Status and Operational Viability			Reasonableness of critical path schedule and demonstrated ability to meet major milestones
			Credibility of fuel resource plan
			Commercial access to and reliability of the proposed technology
			Progress in interconnection process
<i>Subtotal</i>			
Experience and Capability of Bidder and Project Team			Project development experience
			Project financing experience
			Operations and maintenance experience
			Experience in ISO-NE market
Financing			Credibility of the financing plan
			Financial strength of the bidder
Economic Benefit			Direct Employment
			Indirect Employment
			Tax Revenues
<b>Total</b>	<b>20.0</b>		

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project		
Evaluation Factors	Max Points	Rating
Siting and Permitting		
		Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways
		Identification of required permits and approvals and status of plan to obtain permits and approvals
		Community relations plan
<i>Subtotal</i>		
Project Development Status and Operational Viability		
		Reasonableness of critical path schedule and demonstrated ability to meet major milestones
		Credibility of fuel resource plan
		Commercial access to and reliability of the proposed technology
		Progress in interconnection process
<i>Subtotal</i>		
Experience and Capability of Bidder and Project Team		Project development experience
		Project financing experience
		Operations and maintenance experience
		Experience in ISO-NE market
Financing		Credibility of the financing plan
		Financial strength of the bidder
Economic Benefit		Direct Employment
		Indirect Employment
		Tax Revenues
<b>Total</b>	<b>20.0</b>	

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project		
Evaluation Factors	Max Points	Rating
Siting and Permitting		
		Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways
		Identification of required permits and approvals and status of plan to obtain permits and approvals
		Community relations plan
<i>Subtotal</i>		
Project Development Status and Operational Viability		
		Reasonableness of critical path schedule and demonstrated ability to meet major milestones
		Credibility of fuel resource plan
		Commercial access to and reliability of the proposed technology
		Progress in interconnection process
<i>Subtotal</i>		
Experience and Capability of Bidder and Project Team		Project development experience
		Project financing experience
		Operations and maintenance experience
		Experience in ISO-NE market
Financing		Credibility of the financing plan
		Financial strength of the bidder
Economic Benefit		Direct Employment
		Indirect Employment
		Tax Revenues
<b>Total</b>	<b>20.0</b>	

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project		
Evaluation Factors	Max Points	Rating
Siting and Permitting		
		Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways
		Identification of required permits and approvals and status of plan to obtain permits and approvals
		Community relations plan
<i>Subtotal</i>		
Project Development Status and Operational Viability		
		Reasonableness of critical path schedule and demonstrated ability to meet major milestones
		Credibility of fuel resource plan
		Commercial access to and reliability of the proposed technology
		Progress in interconnection process
<i>Subtotal</i>		
Experience and Capability of Bidder and Project Team		Project development experience
		Project financing experience
		Operations and maintenance experience
		Experience in ISO-NE market
Financing		Credibility of the financing plan
		Financial strength of the bidder
Economic Benefit		Direct Employment
		Indirect Employment
		Tax Revenues
<b>Total</b>	<b>20.0</b>	

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project		
Evaluation Factors	Max Points	Rating
Siting and Permitting		
		Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways
		Identification of required permits and approvals and status of plan to obtain permits and approvals
		Community relations plan
<i>Subtotal</i>		
Project Development Status and Operational Viability		
		Reasonableness of critical path schedule and demonstrated ability to meet major milestones
		Credibility of fuel resource plan
		Commercial access to and reliability of the proposed technology
		Progress in interconnection process
<i>Subtotal</i>		
Experience and Capability of Bidder and Project Team		Project development experience
		Project financing experience
		Operations and maintenance experience
		Experience in ISO-NE market
Financing		Credibility of the financing plan
		Financial strength of the bidder
		Direct Employment
		Indirect Employment
Economic Benefit		Tax Revenues
<b>Total</b>	<b>20.0</b>	

### 2014 Rhode Island Renewable Energy RFP Non Pricing Scoring Sheet

Project			
Evaluation Factors	Max Points	Rating	
Siting and Permitting	20.0	Criteria Considered in Each Project	
		Extent to which site control has been achieved and acquisition of any necessary real property rights, including right of ways	
		Identification of required permits and approvals and status of plan to obtain permits and approvals	
		Community relations plan	
<i>Subtotal</i>			
Project Development Status and Operational Viability			
		Reasonableness of critical path schedule and demonstrated ability to meet major milestones	
		Credibility of fuel resource plan	
		Commercial access to and reliability of the proposed technology	
		Progress in interconnection process	
<i>Subtotal</i>			
Experience and Capability of Bidder and Project Team		Project development experience Project financing experience Operations and maintenance experience Experience in ISO-NE market	
Financing		Credibility of the financing plan Financial strength of the bidder	
Economic Benefit		Direct Employment Indirect Employment Tax Revenues	
<b>Total</b>	<b>20.0</b>		

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Division 1-3

Request:

Please provide Exhibit 2 in a live electronic spreadsheet with working formulas.

Response:

Please see Confidential Attachment DIV 1-3 for a live spreadsheet used to create Exhibit 2, which the Company is providing on the enclosed CD-ROM. Because the information contained in the Microsoft Excel spreadsheet contains confidential and proprietary information, the Company is seeking protective treatment of this CD-ROM pursuant to Commission Rule 1.2(g).

Division 1-4

Request:

Please explain how the delivery point, the Roseton 345 kV bus, was selected.

- a. Is this point located within the ISO-NE control area or the NYISO control area?
- b. With this delivery point, how can the Company ensure that purchased energy will be delivered into the ISO-NE control area?
- c. How does the Company expect that the interface between ISO-NE and NYISO will be constrained? Please provide the workpapers and analysis supporting the response.

Response:

- a. The delivery point was determined by NYISO and ISO-NE rules on import/export transactions. For a Bilateral Export Transaction in NYISO, the sink proxy bus for an export to ISO-NE is designated NE\_LOAD\_SANDY\_PD. See NYISO Joint Energy Scheduling System Users Guide ([http://www.nyiso.com/public/webdocs/markets\\_operations/documents/Manuals\\_and\\_Guides/Guides/User\\_Guides/UG-14\\_JESS%20UG\\_v1-0\\_Final.pdf](http://www.nyiso.com/public/webdocs/markets_operations/documents/Manuals_and_Guides/Guides/User_Guides/UG-14_JESS%20UG_v1-0_Final.pdf)).

There are no alternatives at present for an export to ISO-NE.

The Roseton 345 kV bus is the NYISO terminal of the Roseton-Sandy Pond 345 kV transmission facility, which is the NYISO/ISO-NE interconnection, and delivering the energy to the Roseton 345 kV bus effectively delivers energy into the ISO-NE control area. The Roseton 345 kV bus is an appropriate designation of a physical delivery point; however, the above description of the export transaction is more complete in the market operations sense. Further, Section 4.2 of the PPA requires "as of the Effective Date, Delivery of the Energy is contemplated to occur at the Delivery Point and within the ISO-NE Settlement Market System."

- b. See response to part (a).
- c. The Roseton-Sandy Pond 345 kV transmission facility interface between ISO-NE and NYISO would be constrained if the requested reservations for that interface exceeded the capacity of the interface. The bid submitted for the Copenhagen Wind project specified an annual curtailment estimate of 15%. Copenhagen Wind had worked with Customized Energy Solutions to develop this estimate, and National Grid asked Copenhagen Wind to

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Division 1-4, page 2

provide a copy of the report, which is provided with this response as Attachment DIV 1-4c. This report is marked Confidential; therefore, pursuant to Commission Rule 1.2(g), the Company is seeking confidential treatment of the entire report in Attachment DIV 1-4c.

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Division 1-5

Request:

How was the allowance for 15 percent energy curtailment in Section 4.3 of the PPA derived? Provide all relevant document and workpapers that were used to determine that this is an appropriate amount.

Response:

Please see the Company's response to Division 1-4(c). The allowance for the 15 percent energy curtailment began with Copenhagen Wind's representation in their bid, which was based on input provided to Copenhagen Wind by Customized Energy Solutions, and evolved during the PPA negotiations to represent the three potentials for curtailment, as described in the testimony of Ms. Corinne M. DiDomenico. Copenhagen Wind continued to consult Customized Energy Solutions during this process. National Grid's goal was to identify the possibilities for curtailment within this allowance and to develop the appropriate PPA provisions. There is no additional documentation beyond the Customized Energy Solutions report, which is provided as Attachment DIV 1-4c.

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Division 1-6

Request:

Please provide all analysis done by National Grid on the likelihood that physical or economic curtailments, as defined by Ms. DiDomenico on page 12 of her testimony, will occur.

Response:

Please see the response to DIV 1-5.

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Division 1-7

Request:

Is the contract pricing and other terms contingent on the Copenhagen Wind project qualifying for the Production Tax Credit? Please explain why or why not.

Response:

No, the contract pricing and other terms are not contingent on the Copenhagen Wind project qualifying for the Production Tax Credit. Section 5.4(b) of the Power Purchase Agreement states that "Seller shall bear all risks, financial and otherwise, throughout the Term, associated with Seller's or the Facility's eligibility to receive any federal or state tax credits . . . ." Also, Section 2.2.4.2(4) of the RFP required that "proposed prices may neither be conditioned upon nor subject to adjustment based upon the availability of the Federal Production Tax Credit or the Federal Investment Tax Credit, or the availability or receipt of any other government grant or subsidy."

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Division 1-8

Request:

Page 9 of Ms. DiDomenico's testimony states that the project has a project in-service date of December 31, 2017. The redacted and unredacted Exhibit 2 shows a January 2017 in-service date, and has a full-year of generation in 2017. Please clarify the Company's expected in-service date, and revise the redacted and unredacted Exhibit 2, if necessary.

Response:

The correct Commercial Operation Date is December 31, 2017. The discrepancy in the Commercial Operation Date is because of a change by Copenhagen Wind in its proposed Commercial Operation Date. In its bid, Copenhagen Wind provided an estimated Commercial Operation Date of December 31, 2016. Therefore, the analysis featured in Exhibit 2 was performed with an estimated Commercial Operation Date of January 1, 2017. However, after being selected for a long-term contract under the solicitation and during the course of negotiations with National Grid, Copenhagen Wind updated its Commercial Operation Date to December 31, 2017. For purposes of the analysis, the Company has assumed the first month of operation will occur in January 2018.

Please see the Confidential Attachment DIV 1-8 for the revised Exhibit 2 with the updated Commercial Operation Date. Pursuant to Commission Rule 1.2(g), the Company is seeking confidential treatment of the confidential and proprietary information contained in Attachment DIV 1-8. The Company is providing a redacted version of Attachment DIV 1-8 for the public filing.

Note that the revised comparison shows that over the 15-year contract term, the PPA pricing is still projected to be \$62 million below the market forecast on a net present value basis, as stated in the testimony.

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**Copenhagen Wind: 80 MW**

ESAI Power Price Forecast					15 Yr PPA						
Year	WCMA Energy 7x24 (\$/MWh)	RI REC Forecast (\$/MWh)	Energy & RECs	Capacity \$/kW-mo	Delivered Energy (MWh)	Bundled Energy Rate (\$/MWh)	Market Cost	Contract Cost	Remuneration	Total Cost less Market Cost	Total Cost less Market Cost (from Monthly Production Table)
2011											
2012											
2013					0			\$0	\$0		
2014					0			\$0	\$0		
2015					0			\$0	\$0		
2016					0			\$0	\$0		
2017					0			\$0	\$0		
2018					208,015	\$78.75		\$16,381,181	\$450,482		
2019					208,015	\$80.33		\$16,708,805	\$459,492		
2020					208,015	\$81.93		\$17,042,981	\$468,682		
2021					208,015	\$83.57		\$17,383,841	\$478,056		
2022					208,015	\$85.24		\$17,731,517	\$487,617		
2023					208,015	\$86.95		\$18,086,148	\$497,369		
2024					208,015	\$88.69		\$18,447,871	\$507,316		
2025					208,015	\$90.46		\$18,816,828	\$517,463		
2026					208,015	\$92.27		\$19,193,165	\$527,812		
2027					208,015	\$94.11		\$19,577,028	\$538,368		
2028					208,015	\$96.00		\$19,968,569	\$549,136		
2029					208,015	\$97.92		\$20,367,940	\$560,118		
2030					208,015	\$99.87		\$20,775,299	\$571,321		
2031					208,015	\$101.87		\$21,190,805	\$582,747		
2032					208,015	\$103.91		\$21,614,621	\$594,402		
2033											
2034											
2035											
2036											
2037											
					3,120,225	Total	\$417,873,367	\$283,286,597	\$7,790,381	(\$126,796,389)	(\$128,580,933)
					1,546,544	NPV (2015, 7%)	\$203,176,053	\$136,980,748	\$3,766,971	(\$62,428,335)	(\$63,169,055)

Delivery Zone  
 Nameplate  
 Capacity Factor for FCM  
 Discount Rate  
 Escalation  
 Yr 1 Contract Price  
 Estimated Annual Output  
 Estimated COD  
 Estimated Annual Capacity Factor

WCMA  
 80 MW  
 0.0%  
 7.0%  
 2.0%  
 \$78.75  
 208,015  
 Jan-2018  
 29.7% CF



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Monthly Table									
	WCMA Energy Prices		Production		Capacity	RECs	Market Costs	Contract Costs	Contract less Market Costs
	On-Peak	Off-Peak	On-Peak	Off-Peak	\$/kw-mo	\$/MWH			
2015	Jul-15								
2015	Aug-15								
2015	Sep-15								
2015	Oct-15								
2015	Nov-15								
2015	Dec-15								
2016	Jan-16								
2016	Feb-16								
2016	Mar-16								
2016	Apr-16								
2016	May-16								
2016	Jun-16								
2016	Jul-16								
2016	Aug-16								
2016	Sep-16								
2016	Oct-16								
2016	Nov-16								
2016	Dec-16								
2017	Jan-17								
2017	Feb-17								
2017	Mar-17								
2017	Apr-17								
2017	May-17								
2017	Jun-17								
2017	Jul-17								
2017	Aug-17								
2017	Sep-17								
2017	Oct-17								
2017	Nov-17								
2017	Dec-17								
2018	Jan-18								
2018	Feb-18							\$	1,338,150
2018	Mar-18							\$	1,290,612
2018	Apr-18							\$	1,638,199
2018	May-18							\$	1,592,952
2018	Jun-18							\$	1,492,944
2018	Jul-18							\$	1,394,600
2018	Aug-18							\$	1,296,019
2018	Sep-18							\$	1,158,664
2018	Oct-18							\$	1,215,606
2018	Nov-18							\$	1,375,188
2018	Dec-18							\$	1,271,521
2019	Jan-19							\$	1,717,257
2019	Feb-19							\$	1,364,913
2019	Mar-19							\$	1,316,424
2019	Mar-19							\$	1,670,963

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Monthly Table								
WCMA Energy Prices		Production		Capacity	RECs	Market Costs	Contract Costs	Contract less Market Costs
On-Peak	Off-Peak	On-Peak	Off-Peak	\$/kw-mo	\$/MWH			
2019	Apr-19						\$ 1,624,811	
2019	May-19						\$ 1,522,803	
2019	Jun-19						\$ 1,422,492	
2019	Jul-19						\$ 1,321,940	
2019	Aug-19						\$ 1,181,838	
2019	Sep-19						\$ 1,239,918	
2019	Oct-19						\$ 1,402,692	
2019	Nov-19						\$ 1,296,951	
2019	Dec-19						\$ 1,751,602	
2020	Jan-20						\$ 1,392,212	
2020	Feb-20						\$ 1,342,753	
2020	Mar-20						\$ 1,704,382	
2020	Apr-20						\$ 1,657,307	
2020	May-20						\$ 1,553,259	
2020	Jun-20						\$ 1,450,942	
2020	Jul-20						\$ 1,348,379	
2020	Aug-20						\$ 1,205,474	
2020	Sep-20						\$ 1,264,717	
2020	Oct-20						\$ 1,430,746	
2020	Nov-20						\$ 1,322,891	
2020	Dec-20						\$ 1,786,634	
2021	Jan-21						\$ 1,420,056	
2021	Feb-21						\$ 1,369,608	
2021	Mar-21						\$ 1,738,470	
2021	Apr-21						\$ 1,690,453	
2021	May-21						\$ 1,584,324	
2021	Jun-21						\$ 1,479,961	
2021	Jul-21						\$ 1,375,346	
2021	Aug-21						\$ 1,229,584	
2021	Sep-21						\$ 1,290,011	
2021	Oct-21						\$ 1,459,361	
2021	Nov-21						\$ 1,349,348	
2021	Dec-21						\$ 1,822,366	
2022	Jan-22						\$ 1,448,457	
2022	Feb-22						\$ 1,397,000	
2022	Mar-22						\$ 1,773,239	
2022	Apr-22						\$ 1,724,262	
2022	May-22						\$ 1,616,010	
2022	Jun-22						\$ 1,509,560	
2022	Jul-22						\$ 1,402,853	
2022	Aug-22						\$ 1,254,176	
2022	Sep-22						\$ 1,315,811	
2022	Oct-22						\$ 1,488,548	
2022	Nov-22						\$ 1,376,335	
2022	Dec-22						\$ 1,858,814	

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Monthly Table									
	WCMA Energy Prices		Production		Capacity	RECs	Market Costs	Contract Costs	Contract less Market Costs
	On-Peak	Off-Peak	On-Peak	Off-Peak	\$/kw-mo	\$/MWH			
2023	Jan-23							\$ 1,477,426	
2023	Feb-23							\$ 1,424,940	
2023	Mar-23							\$ 1,808,704	
2023	Apr-23							\$ 1,758,747	
2023	May-23							\$ 1,648,331	
2023	Jun-23							\$ 1,539,751	
2023	Jul-23							\$ 1,430,910	
2023	Aug-23							\$ 1,279,259	
2023	Sep-23							\$ 1,342,127	
2023	Oct-23							\$ 1,518,319	
2023	Nov-23							\$ 1,403,862	
2023	Dec-23							\$ 1,896,990	
2024	Jan-24							\$ 1,506,975	
2024	Feb-24							\$ 1,453,439	
2024	Mar-24							\$ 1,844,878	
2024	Apr-24							\$ 1,793,922	
2024	May-24							\$ 1,681,297	
2024	Jun-24							\$ 1,570,546	
2024	Jul-24							\$ 1,459,528	
2024	Aug-24							\$ 1,304,844	
2024	Sep-24							\$ 1,368,970	
2024	Oct-24							\$ 1,548,685	
2024	Nov-24							\$ 1,431,939	
2024	Dec-24							\$ 1,933,910	
2025	Jan-25							\$ 1,537,114	
2025	Feb-25							\$ 1,482,508	
2025	Mar-25							\$ 1,881,776	
2025	Apr-25							\$ 1,829,801	
2025	May-25							\$ 1,714,923	
2025	Jun-25							\$ 1,601,957	
2025	Jul-25							\$ 1,488,719	
2025	Aug-25							\$ 1,330,941	
2025	Sep-25							\$ 1,396,349	
2025	Oct-25							\$ 1,579,659	
2025	Nov-25							\$ 1,460,578	
2025	Dec-25							\$ 1,972,588	
2026	Jan-26							\$ 1,567,856	
2026	Feb-26							\$ 1,512,158	
2026	Mar-26							\$ 1,919,411	
2026	Apr-26							\$ 1,866,397	
2026	May-26							\$ 1,749,222	
2026	Jun-26							\$ 1,633,996	
2026	Jul-26							\$ 1,518,493	
2026	Aug-26							\$ 1,357,560	
2026	Sep-26							\$ 1,424,276	

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		Monthly Table								
		WCMA Energy Prices		Production		Capacity	RECs	Market Costs	Contract Costs	Contract less Market Costs
		On-Peak	Off-Peak	On-Peak	Off-Peak	\$/kw-mo	\$/MWH			
2026	Oct-26								\$ 1,611,252	
2026	Nov-26								\$ 1,489,790	
2026	Dec-26								\$ 2,012,040	
2027	Jan-27								\$ 1,599,214	
2027	Feb-27								\$ 1,542,401	
2027	Mar-27								\$ 1,957,800	
2027	Apr-27								\$ 1,903,725	
2027	May-27								\$ 1,784,206	
2027	Jun-27								\$ 1,666,676	
2027	Jul-27								\$ 1,548,863	
2027	Aug-27								\$ 1,384,711	
2027	Sep-27								\$ 1,452,762	
2027	Oct-27								\$ 1,643,477	
2027	Nov-27								\$ 1,519,585	
2027	Dec-27								\$ 2,052,281	
2028	Jan-28								\$ 1,631,198	
2028	Feb-28								\$ 1,573,249	
2028	Mar-28								\$ 1,996,956	
2028	Apr-28								\$ 1,941,799	
2028	May-28								\$ 1,819,890	
2028	Jun-28								\$ 1,700,009	
2028	Jul-28								\$ 1,579,840	
2028	Aug-28								\$ 1,412,405	
2028	Sep-28								\$ 1,481,817	
2028	Oct-28								\$ 1,676,347	
2028	Nov-28								\$ 1,549,977	
2028	Dec-28								\$ 2,093,326	
2029	Jan-29								\$ 1,663,822	
2029	Feb-29								\$ 1,604,714	
2029	Mar-29								\$ 2,036,895	
2029	Apr-29								\$ 1,980,635	
2029	May-29								\$ 1,856,288	
2029	Jun-29								\$ 1,734,010	
2029	Jul-29								\$ 1,611,437	
2029	Aug-29								\$ 1,440,654	
2029	Sep-29								\$ 1,511,453	
2029	Oct-29								\$ 1,709,874	
2029	Nov-29								\$ 1,580,977	
2029	Dec-29								\$ 2,135,193	
2030	Jan-30								\$ 1,697,098	
2030	Feb-30								\$ 1,636,808	
2030	Mar-30								\$ 2,077,633	
2030	Apr-30								\$ 2,020,248	
2030	May-30								\$ 1,893,414	
2030	Jun-30								\$ 1,768,690	

The Narragansett Electric Company  
d/b/a National Grid  
Docket No. 4574  
Review of Power Purchase Agreement  
Copenhagen Wind Farm, LLC  
Pursuant to R.I.G.L. § 39-26.1-1 et seq.  
Exhibit 2 (Revised)  
Page 7 of 7

Monthly Table								
WCMA Energy Prices		Production		Capacity	RECs	Market Costs	Contract Costs	Contract less Market Costs
On-Peak	Off-Peak	On-Peak	Off-Peak	\$/kw-mo	\$/MWH			
2030	Jul-30						\$ 1,643,666	
2030	Aug-30						\$ 1,469,467	
2030	Sep-30						\$ 1,541,682	
2030	Oct-30						\$ 1,744,071	
2030	Nov-30						\$ 1,612,596	
2030	Dec-30						\$ 2,177,897	
2031	Jan-31						\$ 1,731,040	
2031	Feb-31						\$ 1,669,545	
2031	Mar-31						\$ 2,119,185	
2031	Apr-31						\$ 2,060,653	
2031	May-31						\$ 1,931,282	
2031	Jun-31						\$ 1,804,064	
2031	Jul-31						\$ 1,676,539	
2031	Aug-31						\$ 1,498,856	
2031	Sep-31						\$ 1,572,516	
2031	Oct-31						\$ 1,778,953	
2031	Nov-31						\$ 1,644,848	
2031	Dec-31						\$ 2,221,455	
2032	Jan-32						\$ 1,697,098	
2032	Feb-32						\$ 1,636,808	
2032	Mar-32						\$ 2,077,633	
2032	Apr-32						\$ 2,020,248	
2032	May-32						\$ 1,893,414	
2032	Jun-32						\$ 1,768,690	
2032	Jul-32						\$ 1,643,666	
2032	Aug-32						\$ 1,469,467	
2032	Sep-32						\$ 1,541,682	
2032	Oct-32						\$ 1,744,071	
2032	Nov-32						\$ 1,612,596	
2032	Dec-32						\$ 2,177,897	

The Narragansett Electric Company  
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Copenhagen Wind Farm, LLC  
Responses to Division's First Set of Data Requests  
Issued on August 13, 2015

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Division 1-9

Request:

The label in the upper right-hand corner of the unredacted Exhibit 2 has "Champlain Wind" in the title. Please confirm that the analysis provided is for Copenhagen Wind.

Response:

The analysis provided in Exhibit 2 is for the Copenhagen Wind project. The label in the upper right hand corner of the unredacted version of Exhibit 2 is a typographical error. Please see Attachment DIV 1-8 for a revised Exhibit 2 with the correct label in the upper right hand corner.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4574  
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Division 1-10

Request:

Please provide the carbon price and natural gas price forecasts behind the ESAI Power Price Forecast.

Response:

Please see Confidential Attachment DIV 1-10 for the carbon price and natural gas price forecasts behind the ESAI Power Price Forecast. Pursuant to Commission Rule 1.2(g), the Company is seeking confidential treatment of the confidential and proprietary information contained in Attachment DIV 1-10. The Company is providing a redacted version of Attachment DIV 1-10 for the public filing.



**ES&I Gas Price & RGGI Assumptions for National Grid Forecast; August 2014**

	<i>Henry Hub</i>	<i>Algonquin Citygates</i>	<i>RGGI Carbon Price</i>
	<i>\$/MMBtu</i>	<i>\$/MMBtu</i>	<i>\$/ton</i>
2014			
2015			
2016			
2017			
2018			
2019			
2020			
2021			
2022			
2023			
2024			
2025			
2026			
2027			
2028			
2029			
2030			
2031			
2032			
2033			
2034			
2035			
2036			
2037			
2038			