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PUBLIC UTILITIES COMMISSION

December 1, 2016

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Luly E. Massaro, Clerk  
RI Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: Docket Nos. 4645, 4649 and 4650 in re: Wind Energy Development's Application for Certification of WED COVENTRY SIX, TWO, THREE AND FOUR as Renewable Energy Resources**

Dear Luly:

I have enclosed the original and nine copies of WIND ENERGY DEVELOPMENT'S RESPONSE TO COMMISSION'S FIRST SET OF DATA REQUESTS.

Thank you for your assistance.

Sincerely,

  
Seth H. Handy (HDA)

Enc.

WED RESPONSE TO STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: WIND ENERGY DEVELOPMENT'S  
APPLICATION FOR CERTIFICATION OF WED  
COVENTRY SIX, LLC AS A RENEWABLE ENERGY  
RESOURCE

DOCKET NO. 4645

AND

AND

TOWN OF WEST WARWICK'S APPLICATION FOR  
CERTIFICATION OF WED COVENTRY TWO, LLC  
AS A RENEWABLE ENERGY RESOURCE

DOCKET NO. 4649

AND

NARRAGANSETT BAY COMMISSION'S APPLICATION  
FOR CERTIFICATION OF COVENTRY 3 AND  
COVENTRY 4 AS A RENEWABLE ENERGY RESOURCE

DOCKET NO. 4650

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WIND ENERGY DEVELOPMENT'S RESPONSE TO  
COMMISSION'S FIRST SET OF DATA REQUESTS  
(November 30, 2016)

COMM 1-1: Please provide a one-line diagram of the WED Coventry Six from the interconnection point, including all other existing and planned facilities (e.g., WED Coventry Two, etc.) Please also indicate on the diagram:

- a. All retail and wholesale meters,
- b. Boundaries of ownership of facilities and the facility owner, and
- c. In which program each generation resource will be enrolled (e.g., DG Standard Contracts, Renewable Energy Growth, net metering, qualified facility, etc.).

RESPONSE: Please see attached one line diagram that includes all of the requested information.

COMM 1-2: If the generation facilities addressed above are behind a single interconnection point for the purposes of ISO-NE tariffs and related rules and procedures:

- a. Are the facilities an ISO-NE modeled generator?
- b. Will the aggregate of the generation facilities' energy be metered at the ISO-NE Market Settlement System (MSS) meter?
- c. If so, please indicate the Lead Market Participant.

RESPONSE:

(a) Yes.

(b) Yes, the aggregate generation will be metered at the ISO-NE MSS meter. Wind Energy Development, LLC (“WED”) does not intend to participate in the ISO-NE wholesale market with the project.

(c) WED is the Lead Market Participant.

COMM 1-3: Should the NEPOOL GIS Certificates (RECs) generated by the individual facilities be accounted for at a single interconnection point through an MSS asset, has WED developed a verification plan to disaggregate the RECs to individual generation owners’ GIS accounts? If so, please provide the plan or any supporting documentation (e.g. contracts, memoranda of understanding, etc.).

RESPONSE: Yes. WED feels it makes sense to utilize the single interconnection point and meter for the MSS asset to report the RECs. Provided National Grid is able to sync each of the Coventry Wind turbines so they are on the same billing cycle and shift the billing cycle (as necessary) to ensure that each quarter’s billing cycle aligns with the start and end of each quarterly minting period to allow for correct accounting, WED is willing to act as the disaggregator for the assets. Below is an overview of the plan WED has developed for this service.

- On a quarterly basis:
  - 1) Go into the NEPOOL GIS System and review the total production of the MSS asset.
  - 2) Review each of the National Grid Bills for the applicable quarter and create a spreadsheet that allocates the total generation behind each meter to the turbine owners.
  - 3) Verify there are no significant deviations between the individual turbine SCADA system and the National Grid bill.
  - 4) Allocate RECs according to the provided schedule to the GIS account corresponding to each turbine owner.
  - 5) Email a copy of the tallied spreadsheet to each of the turbine owners [and PUC?] to allow them to view and confirm the allocation.
  
- On an annual basis WED will perform a site visit to ensure the meters and equipment are in good repair.
  
- As needed:
  - 1) Respond promptly to PUC and DPU requests.
  - 2) Report any unexpected deviation in production.

COMM 1-4: Has WED developed a plan to keep the Commission informed about any changes to the individual generators (including the addition and removal of turbines) per Rule 6.5 of the Commission's Rules and Regulations Governing the Implementation of a Renewable Energy Standard?

RESPONSE: Yes. WED will work with each of the turbine owners (including projects WED does not own) to ensure that WED receives updates to any change in the generators. WED is providing asset management services to each of these turbines, so we will maintain access to the 3<sup>rd</sup> party SCADA system which records system output and sends automatic updates that will indicate any generation issue. To the extent that there is any significant temporary change in system output we will check in with the project owner and manufacturer. WED is the market participant for the asset, so WED will know if there is any additional generation that is proposed to be installed and will promptly inform the PUC.