

HOOSIC RIVER HYDRO, LLC



PO Box 338, North Bennington, Vermont 05257 (802)379-2469

Re: FERC project #P-6795
Pownal Tannery Project
Hoosic River Hydro, LLC

July 21, 2018

VIA ELECTRONIC FILING

Scott Albert, Principal/Region Manager
GDS Associates, Inc
1155 Elm Street, Suite 702
Manchester, NH 03101
phone 603.656.0336
scott.albert@gdsassociates.com

Re: Appointment of William P. Short III as Verifier for the Pownal Tannery Project

Mr. Albert,

Please find attached Hoosic River Hydro, LLC's request to appoint William P. Short III as its Verifier for its Pownal Tannery Project, located at 149 Dean Road, North Pownal, Vermont.

Thank you in advance and please let me know if you have any questions or require any further information.

A handwritten signature in dark ink, appearing to read "William F. Scully".

William F. Scully
Hoosic River Hydro, LLC
PO Box 338
North Bennington, VT 05257
July 21, 2018

APPENDIX D
(Revised 6/11/10)
(Required of Applicants Seeking Eligibility for Customer-Sited and/or Off-Grid Generation Facilities and Associated Aggregations)
STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION
RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM
Pursuant to the Renewable Energy Act
Section 39-26-1 et. seq. of the General Laws of Rhode Island

With this submission, Hoosic River Hydro, LLC herewith requests the Appendix D.2 for Pownal Tannery Project to read as follows:

D.2 Please see below for the proposed procedures under which the aggregate Generation Units will operate:

- (a) Name and contact information of the Aggregator Owner, to which these regulations and stipulations of certification shall apply, and who shall be the initial owner of any NEPOOL GIS Certifications so certified;

Hoosic River Hydro, LLC
Attn: William F. Scully, Operating Manager
P.O. Box 338
North Bennington, Vermont 05257
wfscully@gmail.com

- (b) Name, contact information, and qualifications of the Verifier. Qualifications shall include any information the applicant believes will assist the Commission in determining that the Verifier will accurately and efficiently carry out its duties. After receipt of the application, the Commission may require additional evidence of qualifications;

The Verifier of the facility output and resultant certificates will be Mr. William P. Short III, consultant. Mr. Short has the following qualifications:

- Undergraduate and graduate degrees in electrical engineering from Duke University and University of Pennsylvania, respectively;
- Participant in the drafting of and knowledgeable about the Rhode Island Renewable Energy Standard regulations, including its Verifier regulations;
- Participant in the drafting of and knowledgeable about all other New England states renewable portfolio standards, either at the legislative or regulatory levels;
- Participant in the drafting of and knowledgeable about the Operating Rules of the NEPOOL Generation Information System;
- Qualified Independent Verifier in Massachusetts, Independent Monitor in New Hampshire and Verifier in Connecticut. (There is no equivalent requirement in Maine);
- Verifier of generation located in Massachusetts, Maine, New Hampshire and Rhode Island for wind, solar, biomass, hydro and combined heat and power facilities.

Mr. Short's contact information is:

William P. Short III
Consultant
44 West 62nd Street (street address)
New York, New York 10023-7008
P.O. Box 237173 (mailing address)
New York, New York 10023-7173
(917) 206-0001 Office
(201) 970-3707 Cell
w.shortiii@verizon.net

(c) A declaration of any and all business or financial relations between Aggregator Owner and Verifier, which the Commission will use to evaluate the independence of the Verifier.²

Mr. Short has no direct or indirect ownership interest in Hoosic River Hydro, LLC or any affiliate of this entity. Neither Mr. Short nor any immediate family member is an officer, director, partner, employee or representative of Hoosic River Hydro, LLC. Mr.

² Reasons for ruling that a Verifier is not sufficiently independent include, but are not limited to: i) If one entity owns, directly or indirectly, or if a natural person so owns, 10% or more of the voting stock or other equity interest in the other entity; ii) If 10% or more of the voting stock or other equity interests in both entities are owned, directly or indirectly, by the same entity or a natural person; or iii) If one entity is a natural person, and such entity or a member of such entity's immediate family is an officer, director, partner, employee or representative of the other entity.

Short's business relationship with Hoosic River Hydro, LLC is solely that of an independent consultant. Among his duties for Hoosic River Hydro, LLC are the following:

Hoosic River Hydro, LLC may request that Mr. Short assist Hoosic River Hydro, LLC with the registration, creation and sale of the NEPOOL GIS certificates generated by its facility, located in North Pownal, Vermont (the "Facility"). Specifically, on behalf of Hoosic River Hydro, LLC, Mr. Short will register its Facility with the NEPOOL GIS. Mr. Short will also assist Hoosic River Hydro, LLC in marketing its NEPOOL GIS certificates. Included in this work, Mr. Short will offer the NEPOOL GIS certificates directly to New England Distribution Companies in their periodic REC auctions, post for sale the NEPOOL GIS certificates on the NEPOOL GIS Bulletin Board; work with REC brokers on the sale of certificates to other New England Load Servicing Entities and assist in the documentation, including transfer of funds, from the sales of NEPOOL GIS certificates.

Hoosic River Hydro, LLC may request that Mr. Short assist Hoosic River Hydro, LLC with the registration of its Facility as either Vermont Class I or Class II renewable energy source, Massachusetts Class I or II renewable energy source, a Connecticut Class I renewable energy source, a Rhode Island New renewable energy resource, a New Hampshire Class I or IV renewable energy source and a Maine Class I or Class II renewable resource to the extent that its Facility is not presently certified as such sources.

Hoosic River Hydro, LLC may request that Mr. Short be its Independent Verifier (as that term is defined by the Massachusetts Department of Energy Resources), Independent Monitor (as that term is defined by the New Hampshire Public Utilities Commission), Verifier (as that term is defined by the Connecticut Public Utility Regulatory Authority) and Verifier (as that term is defined by the Rhode Island Public Utility Commission) for the NEPOOL GIS certificates generated by its Facility.

- (c.1) The Aggregation Agreement shall include a statement indicating under what circumstances the Verifier would not be considered sufficiently independent of the individual Generation Unit, and that Generation Units not meeting this independence test would not be allowed to participate in the aggregation;

Since Mr. Short is paid a fixed fee for his services, there is no way, unless his consulting agreement is modified, that he cannot be qualified as a Verifier. If Mr. Short's business relationship should change with Verifier (for example, he was to become an officer, director, partner, employee or representative of Hoosic River Hydro, LLC or he were

to be paid based upon production by the facility), Hoosic River Hydro, LLC will immediately inform the Commission of such modifications.

- (d) Type of technology that will be included in the aggregation, and statement that the aggregation will include only individual Generation Units that meet all the requirements of these regulations, for example physical location, vintage, etc. (All generators within the aggregation must be of the same technology and fuel type);

The only technology type included in this application is hydropower. If additional generating units are added, and this application becomes an aggregation, then all of the generating units within it will match this unit's technology and vintage.

- (e) Proposed operating procedures for the aggregation, by which the Aggregation Owner shall ensure that individual Generation Units in the aggregation comply with all eligibility requirements and that the NEPOOL GIS Certificates created accurately represent generation;³

Generation production data will be based on readings from revenue meters owned and maintained by Green Mountain Power and derived from the monthly utility billing records rendered by Green Mountain Power (the interconnecting utility) and recipient of all exported power. Hoosic River Hydro, LLC already has and maintains the necessary account with the NEPOOL GIS. Mr. Short will double check the data and compare the output to other hydropower systems he monitors for quality control before uploading data to the NEPOOL GIS. Mr. Short will also have the right and ability to stop by and tour the facility at any time to verify the output and the functioning of the metering and data collection system.

- (f) Description of how the Verifier will be compensated for its services by the aggregator. In no instances will an aggregation be certified in which the Verifier is compensated in a manner linked to the number of NEPOOL GIS Certificates created by the aggregation; and

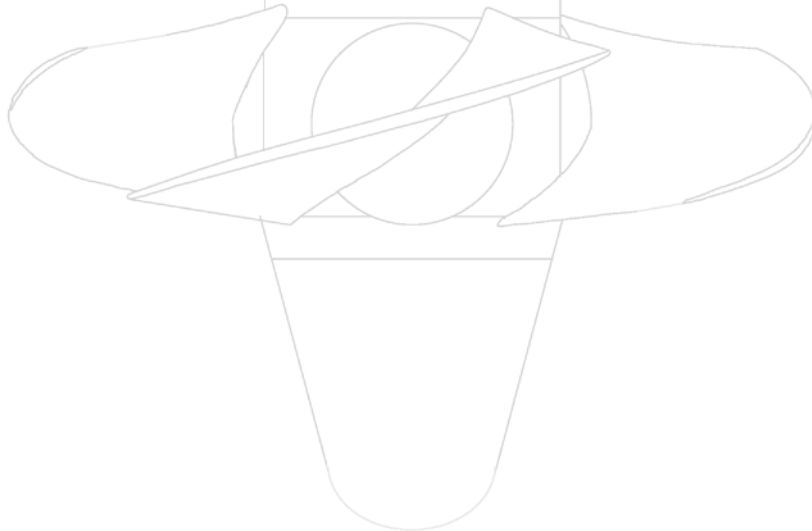
Please see response to Item C above.

- (a) Confirmation and a description of how, no less frequently than quarterly, the Verifier will directly enter into the NEPOOL GIS the quantity of energy production in the applicable time

³ At a minimum, these procedures will: i) require a determination by the Aggregation Owner that the Generation Unit is in compliance with these Renewable Energy Standard regulations and the Aggregation Agreement as approved by the Commission, and an independent determination by the Verifier that the Generation Unit exists; ii) require a meter reading procedure that allows the Verifier to read meters on the Generation Units; meter readings may be manual or remote and via the aggregators own system or via an independent system, but in all cases shall comply with NEPOOL GIS Operating Rules regarding metering; iii) require confirmation that Verifier will be entering the quantity of energy production in to the NEPOOL GIS system as described in paragraph (g) for NEPOOL GIS to create NEPOOL GIS Certificates; and OL GIS Certificates; and ; iv) include a procedure for the Verifier to report to the Commission on the results of their verification process.

period from each Generation Unit in the aggregation. The entry of generation data by the Verifier must be through an interface designated for this purpose by the NEPOOL GIS and in accordance with NEPOOL GIS Operating Rules applicable to Third-Party Meter Readers, and to which the Aggregation Owner shall not have access.⁴

Mr. Short will report the quantity of energy produced by the generation unit at least quarterly to the NEPOOL GIS. Such data will be derived from the monthly utility billing records rendered by Green Mountain Power (the interconnecting utility) and recipient of all exported power. Short already has and maintains the necessary account with the NEPOOL GIS. Mr. Short will double check the data and compare the output to other hydropower systems he monitors for quality control before uploading data to the NEPOOL GIS. Short will also have the right and ability to stop by and tour the facility at any time to verify the output and the functioning of the metering and data collection system.



Appendix D – Customer Sited/Off-Grid Generation Facilities (Rev. 6/11/10) D-4

⁴ Such generation data shall not include any generation data from previous time periods, except as provided for in this section. Output of less than one MWh by any single Generation Unit within the aggregation may be applied to the entire aggregation's generation, and generation of the aggregation less than one full MWh may be applied to the subsequent quarter in accordance with NEPOOL GIS Operating Rules.