

Massaro, Luly (PUC)

From: Avital Kohananoo <akohananoo@entersolar.com>
Sent: Wednesday, October 24, 2018 4:20 PM
To: Renewable Energy Standard
Cc: Massaro, Luly (PUC); Tal Bernard
Subject: [EXTERNAL] : Kenyon West Kingston - Docket #4853, Change of Verifier
Attachments: West Kingston Appendix D Section D.2 Locus EXECUTED.pdf; Kenyon West Kingston - RI PUC - Appendix D Locus.pdf

Hello,

We have decided to change the independent verifier for Kenyon West Kingston (Docket #4853) from EnterSolar, LLC to Locus Energy Inc. Locus energy specializes in solar monitoring and is more equipped to manage the data reporting.

An updated Appendix D is attached with Locus Energy listed as the verifier.

Please let me know if you have any questions.

Thank you,
Avital Kohananoo

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**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**

Customer-sited and Off-grid Generation Facilities located in Rhode Island may be certified as an eligible resource if their NEPOOL GIS Certificates are created by way of an aggregation of Generation Units using the same generation technology, and so long as the aggregation is certified by the Commission. Please complete the following and attach documentation, as necessary to support all responses:

D.1 Please identify the location(s) in Rhode Island of each Generation Unit that is interconnected on the End-use Customer’s side of the retail electricity meter in such a manner that it displaces all or part of the metered consumption of the End-use Customer, or not connected to a utility transmission or distribution system.

141 Fairgrounds Rd. West Kingston, RI 02892

D.2 Please attach proposed procedures under which the aggregate Generation Units will operate (“Aggregation Agreement”). In accordance with Section 6.8.(iii) of the RES Regulations, the proposed Aggregation Agreement shall contain the following information:

- (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;
- (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;

- (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
- (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;
- (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);
- (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
- (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
- (g) 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 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 access⁴.

D.3 Applicant must acknowledge that:

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.

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.

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.

(a) any changes to or deviations from the Aggregation Agreement will be considered a change in generator status, and will require recertification by the Commission;

← please check this box to acknowledge this requirement

N/A or other (please explain) _____

(b) the Commission will be promptly notified of any changes to or deviations from the Aggregation Agreement; and

← please check this box to acknowledge this requirement

N/A or other (please explain) _____

(c) in the event that notice of such changes or deviations is not promptly given, all Generation Units in the aggregation may be de-certified.

← please check this box to acknowledge this requirement

N/A or other (please explain) _____

D.4 Applicant must certify that:

If the Generation Unit (or aggregation of generation units) is a Customer-sited or Off-grid Generation Resource, as defined in Section 39-26-2.4 of the General Laws of Rhode Island and Section 3.26 of the RES Regulations, respectively, the associated Generation Attributes have not otherwise been, nor will be sold, retired, claimed or represented as part of electrical energy output or sales, or used to satisfy obligations in jurisdictions other than Rhode Island.

← please check this box to certify that this statement is true

N/A or other (please explain) _____

Aggregation Agreement

- (a) Aggregator:

Fairground Realty, LLC
Bethany Curtis
141 Fairgrounds Rd. West Kingston, RI 02892
401-792-3704
B.Curtis@kenyonconsumer.com

- (b) Verifier:

Locus Energy Inc.
2 Hudson Pl, Hoboken, NJ 07030
877-562-8736
reporting@locusenergy.com

Locus Energy Inc. is a solar monitoring and data analytics platform provider for the solar photovoltaic (PV) market spanning the residential, commercial, and utility sectors, across the globe. Locus Energy's cloud-based software aggregates, organizes, and analyzes performance data from multiple sources, making it easier to access, manage, and identify the causes of a solar system's failure to meet performance expectations. With a deep intellectual property portfolio, Locus Energy provides many of the largest utilities, capital providers, equipment manufacturers, and asset managers with sophisticated software to track performance across large portfolios of solar installations.

- (c) Locus Energy Inc. will be the solar monitoring and data analytics provider for the PV system in review and will provide operations and maintenance for the Aggregator.

(c.1) Locus Energy Inc. has no other relationship with the Aggregator beyond the position of Verifier.

- (d) The technology being used in the aggregation is a single photovoltaic system. The aggregation will only include Generation Units that meet the requirements of the State of Rhode Island Public Utilities Commission.

- (e) Through the monitoring platform the aggregator will be able to view the data in real-time. Data will be verified and inputted into NEPOOL GIS.
- (f) The Verifier will be compensated for its services by the Aggregator via an annual fee as noted in the O&M contract for the Verifier's services.
- (g) Once a quarter, Locus Energy will pull data from the revenue-grade meter and input the data onto the NEPOOL GIS system.

Landon Kimble
Name

Landon Kimble
Signature

10/19/2018
Date