

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

IN RE: KEARSARGE GB LLC – :
RENEWABLE ENERGY STANDARD : **DOCKET NO. 4858**
CERTIFICATION APPLICATION FOR :
GENERATION UNIT: KEARSARGE GB :

IN RE: KEARSARGE UXBRIDGE LLC- :
RENEWABLE ENERGY STANDARD : **DOCKET NO. 4891**
CERTIFICATION APPLICATION FOR :
GENERATION UNITS: KEARSARGE UXBRIDGE :

**PUBLIC UTILITIES COMMISSION’S (PUC) FIRST SET OF DATA REQUESTS TO
KEARSARGE UXBRIDGE LLC**

(Issued July 8, 2019)

(Responses due by July 29, 2019)

Background:

The Rhode Island Renewable Energy Standard does not allow behind-the-meter net metering systems to be qualified under the Renewable Energy Standard if they are located outside of Rhode Island. The PUC’s regulatory policy is that for systems located in Rhode Island, remote net metering systems are net metering systems. Thus, they are considered to be offsetting load. All net metering systems are required to register with the NEPOOL-GIS in the same manner. The PUC does not yet have a policy for remote net metering systems located outside of Rhode Island.

In January 2019, Kearsarge Uxbridge was asked and answered the following questions:

- Q. For each Kearsarge facility, will any of the generation be used to offset customer-sited load (either through direct electrical connection, or through a net-metering arrangement with the interconnecting electric utility, or through a net-metering arrangement with a third party customer of the interconnecting electric utility)? If yes, please describe the contractual mechanisms through which this generation is committed.
- A. No generation from this facility will be used to offset customer-sited load. This facility is structured under a virtual net metered arrangement where the energy is sent back onto the National Grid distribution lines and the net metered credits are sent, virtually, to Massachusetts municipal off-takers.
- Q. The companies (Kearsarge Uxbridge, LLC and Kearsarge GB, LLC) are listed as the owners of the subject Generation Units. To what extent do these companies have control over the generation sites and/or the sites where customer load may be served by these facilities?

- A. Kearsarge Uxbridge LLC owns the generation unit and owns the land on which the unit is located. There is no customer load being served by this facility. As described in Question #1, a virtual net metered power purchase agreement is in place with municipal off-takers and all energy produced is exported back onto the grid.

Follow-up questions:

The following are follow-up questions to which responses are due on or before July X, 2019:

1. Please confirm that both the Kearsarge GB and Kearsarge Uxbridge facilities were registered in the NEPOOL-GIS with a NON designation. If one was not, please clarify for each.
2. While the facilities will not physically offset load, are they considered to be net metering facilities of any kind by the Massachusetts Electric Company?
3. Please provide a copy (or hyperlink) to the net metering tariff under which the customer will be credited with the net metering credits from the Kearsarge facilities.
4. Is the tariff provided in response to number 3 different for behind-the-meter net metering facilities?
5. Please provide any information of which Kearsarge is aware that the Massachusetts Department of Public Utilities treats virtual net metering facilities differently from behind-the-meter net metering facilities for purposes of its RPS or any other regulatory purpose.