

## Massaro, Luly (PUC)

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**From:** Peter Waldmann <peter.waldmann@aes.com>  
**Sent:** Thursday, October 17, 2019 12:22 PM  
**To:** Renewable Energy Standard  
**Cc:** Travis Franklin; Karen Schoettler; Matt Allegretto  
**Subject:** [EXTERNAL] : RER application supplement University Solar, LLC- docket 4910  
**Attachments:** RER - Application University Solar - AES\_10.17.19.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon Rhode Island PUC,

I'm writing in regards to the RER application for University Solar, LLC – docket 4910. The documentation to the docket 4910 got originally submitted by Energy Development Partners in November of 2018. AES acquired the University Solar, LLC (field segments 1-3) earlier this year from Energy Development Partners. We would like to add the attached supplement to the application so that the PUC can issue an order for it.

Please let me know if there is any additional information required.

Thank you,

**Peter Waldmann** | *Project Development Manager*  
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The AES Corporation | *we are the energy*

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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**

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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.

*260 Robin Hollow Road, West Greenwich, Rhode Island 02817*

- 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;

*Aggregator Owner Name: University Solar, LLC*  
*Aggregator Owner Contact Email: desoc@aes.com*  
*Aggregator Owner Contact Phone: (303) 444-3020*

*Initial Owner of NEPOOL GIS Certs: University Solar, LLC*

- (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;

***Independent Verifier's identity and contact information.***

***Organization: Trimark Associates, Inc. Folsom, CA***

***Contact Person's Name: Kyle Jackson***

***Title: Director of Metering Services***

***Email Address: kjackson@trimarkassoc.com***

***Phone #: (916) 357-5970***

***Qualifications: Currently qualified as QRE/Data Provider for WREGIS, MIRECS, CA SGIP, CA CSI, MASS CEC, NAR***

- (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.<sup>1</sup>

(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;

***Trimark Associates, Inc. provides independent monitoring and reporting services. Trimark Associates, Inc. works closely with the contracted installer and/or the end user to integrate their data acquisition system (DAS) in order to monitor and report production data to responsible agencies such as NEPOOL GIS. The DAS Trimark Associates, Inc. provides include metering equipment and software which is integrated with the PV system installation. Trimark Associates, Inc. employs only revenue-grade meters provided by qualified suppliers. Although Trimark Associates, Inc. sells equipment to be used in conjunction with the PV system, by no means does Trimark Associates, Inc. hold a direct or indirect ownership in the renewable energy source. Trimark Associates, Inc. has no financial interest and receives no compensation in Renewable Energy Certificates (RECs) generated by any source using Trimark Associates, Inc. as the independent monitor. Trimark Associates, Inc. shall not receive compensation for monitoring services that is a function of the number of certificates issued to any source using its independent monitoring and reporting services.***

- (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.

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<sup>1</sup> 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.

(All generators within the aggregation must be of the same technology and fuel type);

***Photovoltaics. The aggregation will only include individual Generating Units that meet all the requirements of these regulations and will all be of the same technology.***

- (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;<sup>2</sup>

***As the Generation Unit Owner, University Solar, LLC, takes responsibility for the registration, coordination, and compliance of all eligibility requirements. Using the Trimark Vantage system, University Solar, LLC is able to confirm that NEPOOL GIS Certificates accurately represent generation. Trimark is able to comply with all requirements mentioned in Question D.2(e)***

- (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

***Verifier (Trimark) will charge a fixed monthly fee to read the meter, validate data and prepare and submit data files to NEPOOL GIS.***

- (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

***Trimark will submit energy production to NEPOOL GIS on a monthly basis through the approved NEPOOL GIS interface.***

NEPOOL GIS Operating Rules applicable to Third-Party Meter Readers, and to which the Aggregation Owner shall not have access<sup>3</sup>.

### D.3 Applicant must acknowledge that:

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<sup>2</sup> 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.

<sup>3</sup> 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) \_\_\_\_\_  
\_\_\_\_\_