

**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.

22 Victory Highway, West Greenwich, RI 02817 (Plat 20, Lot 10-1)  
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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: **\*Responses to D.2 (a)-(g) are included as an attachment following the response to D.4\***

- (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.<sup>2</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;
- (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;<sup>3</sup>
- (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 access<sup>4</sup>.

### D.3 Applicant must acknowledge that:

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<sup>2</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.

<sup>3</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>4</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) \_\_\_\_\_  
\_\_\_\_\_

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**RENEWABLE NEERGY RESOURCES ELIGIBILITY FORM – Appendix D**

**Pursuant to the Renewable Energy Act**

**Section 39-26-1 et. Seq. of the General Laws of Rhode Island**

**Part D.2**

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;

**Applicant’s Response:**

**Mark DePasquale  
Founder and Chairman  
GD West Greenwich Victory I, LLC  
3760 Quaker Lane, North Kingstown, RI 02852  
401-295-4998  
[md@green-ri.com](mailto:md@green-ri.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;

**Applicant’s Response:**

**The Verifier will be the Narragansett Electric Company d/b/a National Grid (“National Grid”). It is the primary local utility in the State of Rhode Island and Providence Plantations. National Grid is the automatic verifier for numerous remote net metered renewable energy projects in Rhode Island, including nearly all of the Generation Units associated to the Generation Unit Operator.**

(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.

**Applicant’s Response:**

**The Generation Unit Owner, GD West Greenwich Victory I, LLC, has no ownership or financial relations with National Grid outside of its Verifier role. National Grid has no stake in the organization at this time and will not do so in the future.**

(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;

**Applicant's Response:**

**National Grid is sufficiently independent per 810-RICR-40-05-2, 2.6(H)(3) and the required qualifications that are associated to it. In the case that this were to change, a new verifier would be selected and reported to comply with the outlined regulations.**

(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);

**Applicant's Response:**

**This is a ground-mounted Solar Photovoltaic generating unit, which will meet the requirements of the Renewable Energy Act, Section 39-26-1 et. Seq. of the General Laws of Rhode Island and will have an independent meter by the local utility for monitoring the Generation Unit's production.**

(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;

**Applicant's Response:**

**This is a singular solar photovoltaic project and is not an aggregation. As the eligible local utility, National Grid would independently collect and verify all generated RECs to NEPOOL GIS through its independent revenue-grade meter sources. National Grid will access and record monthly Generation Unit production through its revenue-grade production meter. After verifying the energy production, National Grid will report the generation meter data to NEPOOL GIS to the Generation Unit's respective NEPOOL GIS Asset ID and will respond to any questions, surveys, or requested reports from the RI PUC or other associated authorities.**

**National Grid may utilize the two redundant revenue grade meters in the case it needs to compare data quality prior to submitting generation to NEPOOL GIS or for resettlement purposes. All production data is gathered automatically by the revenue grade meter sources and are in accordance with the typical industry standard throughout the Independent System Operator of New England (ISONE).**

(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

**Applicant's Response:**

**The Verifier will not receive any compensation for its data reporting services.**

(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 access.

**Applicant's Response:**

**National Grid will input Generation Unit's production data that it collected and verified from the independent revenue-grade meter into the NEPOOL GIS system. This information input by National Grid would occur automatically on a monthly basis.**

**National Grid uses revenue grade meters to gather production data that are collected independently of the Generation Unit's Owner or Operator. This production data is sufficient for ISONE as well as both renewable energy programs located within Rhode Island: The Renewable Energy Growth Program (REG) as well as the Net Meter Credit Program. This meter is only accessible through National Grid and is only used for reporting independent production data from the Generation Unit.**