Blackstone Hydro Associates
130 Prospect Street
Cambridge, Massachusetts 02139

Tel: 617 491 2320
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July 10, 2020

Blackstone Hydro, LLC

Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

SUBJECT: Application for Eligibility of Central Falls Hydroelectric Project, FERC P-3063 as a New Renewable Energy Resource

Dear Commission Clerk,

Blackstone Hydro Associates, LLC (BH) hereby respectfully requests that the State of Rhode Island Public Utilities Commission issue a declaratory judgment under 810-RICR-00-00-1.11(C) on the eligibility of BH's Central Falls Hydroelectric Project (CF) as a Repowered New Renewable Energy Resource pursuant to 810-RICR-40-05-2 and 810-RICR-39-26-1 et. seq of the General Laws of Rhode Island.

The Project is a Run-of-River facility that will have a nameplate capacity of 0.740 MW and that does not cause any appreciable change in the river flow. The project is currently undergoing Federal Energy Regulatory Commission (FERC) relicensing. As part of this relicensing work, BH is proposing a large capital investment including replacing the two existing turbine generators, installation of a new minimum flow unit, installation of downstream fish passage facilities, installation of a new fish friendly intake, and installation of a new trashrack. Based upon the attached application and appendices, BH is seeking a declaratory judgment for eligibility as a repowered renewable energy resource in the State of Rhode Island. BH feels that the capital investment, increased turbine/generator efficiency, replacement of the existing generation unit's prime movers, installation of a new minimum flow turbine/generator, and installation of a new trashrake described in the attached documents qualifies the proposed CF project as a Repowered New Renewable Energy Resource.

The Project is located in the Rhode Island portion of the ISO-NE grid and has been assigned NEPOOL-GIS Asset Identification Number NON34498. The existing project configuration has been certified by the RIPUC as a Rhode Island Public Utilities Commission Eligible Renewable Energy Resource Facility Certification Number RI-3822-E12 as a Eligible Existing Renewable Energy.

Should you have any questions regarding this filing, please contact the undersigned at bleahy@theshorelinecorp.com.

Sincerely,

Robert J. Leahy
Blackstone Hydro Associates, LLC

RIPUC Use Only	
Date Application Received:	__ __/__ __/__ __
Date Review Completed:	__ __/__ __/__ __
Date Commission Action:	__ __/__ __/__ __
Date Commission Approved:	__ __/__ __/__ __

GIS Certification #:

_____

RENEWABLE ENERGY RESOURCES ELIGIBILITY FORM

The Standard Application Form
Required of all Applicants for Certification of Eligibility of Renewable Energy Resource
(Version 8 – December 5, 2012)

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
Pursuant to the Renewable Energy Act
Section 39-26-1 et. seq. of the General Laws of Rhode Island

NOTICE:
When completing this Renewable Energy Resources Eligibility Form and any applicable Appendices, please refer to the State of Rhode Island and Providence Plantations Public Utilities Commission Rules and Regulations Governing the Implementation of a Renewable Energy Standard (RES Regulations, Effective Date: January 1, 2006), and the associated RES Certification Filing Methodology Guide. All applicable regulations, procedures and guidelines are available on the Commission's web site: www.ripuc.org/utilityinfo/res.html. Also, all filings must be in conformance with the Commission's Rules of Practice and Procedure, in particular, Rule 1.5, or its successor regulation, entitled "Formal Requirements as to Filings."

• Please complete the Renewable Energy Resources Eligibility Form and Appendices using a typewriter or black ink.

• Please submit one original and three copies of the completed Application Form, applicable Appendices and all supporting documentation to the Commission at the following address:

Rhode Island Public Utilities Commission
Attn: Luly E. Massaro, Commission Clerk
89 Jefferson Blvd
Warwick, RI 02888

In addition to the paper copies, electronic/email submittals are required under Commission regulations. Such electronic submittals should be sent to Res.filings@puc.ri.gov.

• In addition to filing with the Commission, Applicants are required to send, electronically or electronically and in paper format, a copy of the completed Application including all attachments and supporting documentation, to the Division of Public Utilities and Carriers and to all interested parties. A list of interested parties can be obtained from the Commission's website at www.ripuc.org/utilityinfo/res.html.

• Keep a copy of the completed Application for your records.

• The Commission will notify the Authorized Representative if the Application is incomplete.

• Pursuant to Section 6.0 of the RES Regulations, the Commission shall provide a thirty (30) day period for public comment following posting of any administratively complete Application.

• Please note that all information submitted on or attached to the Application is considered to be a public record unless the Commission agrees to deem some portion of the application confidential after consideration under section 1.2(g) of the Commission's Rules of Practice and Procedure.

• In accordance with Section 6.2 of the RES Regulations, the Commission will provide prospective reviews for Applicants seeking a preliminary determination as to whether a facility would be eligible prior to the formal certification process described in Section 6.1 of the RES Regulations. Please note that space is provided on the Form for applicant to designate the type of review being requested.

• Questions related to this Renewable Energy Resources Eligibility Form should be submitted in writing, preferably via email and directed to: Luly E. Massaro, Commission Clerk at Res.filings@puc.ri.gov.

SECTION I: Identification Information

1.1 Name of Generation Unit (sufficient for full and unique identification):

Central Falls Hydroelectric Project, FERC P-3063

1.2 Type of Certification being requested (check one):

☐ Standard Certification ☒ Prospective Certification (Declaratory Judgment)

1.3 This Application includes: (Check all that apply)[1]

☐ APPENDIX A: Authorized Representative Certification for Individual Owner or Operator
☐ APPENDIX B: Authorized Representative Certification for Non-Corporate Entities Other Than Individuals
☒ APPENDIX C: Existing Renewable Energy Resources
☐ APPENDIX D: Special Provisions for Aggregators of Customer-sited or Off-grid Generation Facilities
☐ APPENDIX E: Special Provisions for a Generation Unit Located in a Control Area Adjacent to NEPOOL
☐ APPENDIX F: Fuel Source Plan for Eligible Biomass Fuels

1.4 Primary Contact Person name and title:

Robert Leahy, Chief Operating Officer The Shoreline Corporation, Management Agent for Blackstone Hydro Associates, LLC

1.5 Primary Contact Person address and contact information:
Address: 130 Prospect Street, Cambridge, MA 02139
Phone: 617-491-2320 X130
Fax: 617-492-0197
Email: bleahy@theshorelinecorp.com
Backup Contact Person name and title: Simeon Bruner, President BH Corp, Manager

1.6 Backup Contact Person address and contact information:
Address: 130 Prospect Street, Cambridge, MA 02139
Phone: 617-491-2320
Fax: 617-492-0197
Email: sbruner@theshorelinecorp.com

1.7 Name and Title of Authorized Representative (*i.e.*, the individual responsible for certifying the accuracy of all information contained in this form and associated appendices, and whose signature will appear on the application):

[1] Please note that all Applicants are required to complete the Renewable Energy Resources Eligibility Standard Application Form and all of the Appendices that apply to the Generation Unit or Owner or Operator that is the subject of this Form. Please omit Appendices that do not apply.

Robert Leahy, Robert Leahy, Chief Operating Officer The Shoreline Corporation, Management Agent for Blackstone Hydro Associates, LLC

Appendix A or B (as appropriate) completed and attached? ☒ Yes ☐ No ☐ N/A

1.8 Authorized Representative address and contact information: Same as above

1.9 Owner name and title: Blackstone Hydro Associates, LLC

1.10 Owner address and contact information:
C/O The Shoreline Corporation
Address: 130 Prospect Street, Cambridge, MA 02139
Phone: 617-491-2320
Fax: 617-492-0197
Email: sbruner@theshorelinecorp.com

1.12 Owner business organization type (check one):
- ☐ Individual
- ☐ Partnership
- ☒ Corporation
- ☐ Other: _____

1.13 Operator name and title: Blackstone Hydro Associates, LLC

1.14 Operator address and contact information:
C/O The Shoreline Corporation
Address: 130 Prospect Street, Cambridge, MA 02139
Phone: 617-491-2320 X130
Fax: 617-492-0197
Email: bleahy@theshorelinecorp.com

1.15 Operator business organization type (check one):
- ☐ Individual
- ☐ Partnership
- ☒ Corporation
- ☐ Other: _____

SECTION II: Generation Unit Information, Fuels, Energy Resources and Technologies

2.1 ISO-NE Generation Unit Asset Identification Number or NEPOOL GIS Identification Number (either or both as applicable): NON 34498

2.2 Generation Unit Nameplate Capacity: +/- 0.740 MW[2]

2.3 Maximum Capacity Post Upgrade/Rehabilitation Condition: +/- 0.740 MW[3]

2.4 Please indicate which of the following Eligible Renewable Energy Resources are used by the Generation Unit: (Check ALL that apply) – *per RES Regulations Section 5.0*

- ☐ Direct solar radiation
- ☐ The wind
- ☐ Movement of or the latent heat of the ocean
- ☐ The heat of the earth
- ☒ Small hydro facilities
- ☐ Biomass facilities using Eligible Biomass Fuels and maintaining compliance with all aspects of current air permits; Eligible Biomass Fuels may be co-fired with fossil fuels, provided that only the renewable energy fraction of production from multi-fuel facilities shall be considered eligible.
- ☐ Biomass facilities using unlisted biomass fuel
- ☐ Biomass facilities, multi-fueled or using fossil fuel co-firing
- ☐ Fuel cells using a renewable resource referenced in this section

2.5 If the box checked in Section 2.4 above is "Small hydro facilities", please certify that the facility's aggregate capacity does not exceed 30 MW. – *per RES Regulations Section 3.32*

☒ ← check this box to certify that the above statement is true

☐ N/A or other (please explain) _____

_____

2.6 If the box checked in Section 2.4 above is "Small hydro facilities", please certify that the facility does not involve any new impoundment or diversion of water with an average salinity of twenty (20) parts per thousand or less. – *per RES Regulations Section 3.32*

☒ ← check this box to certify that the above statement is true

☐ N/A or other (please explain) _____

_____

2.7 If you checked one of the Biomass facilities boxes in Section 2.4 above, please respond to the following:

A. Please specify the fuel or fuels used or to be used in the Unit: _____

_____

B. Please complete and attach Appendix F, Eligible Biomass Fuel Source Plan.

Appendix F completed and attached? ☐ Yes ☐ No ☐ N/A

[2] Post upgrade/rehabilitation condition per FERC license application

[3] Post upgrade/rehabilitation condition per FERC license application

2.8 Has the Generation Unit been certified as a Renewable Energy Resource for eligibility in another state's renewable portfolio standard?

☐ Yes ☒ No If yes, please attach a copy of that state's certifying order.

Copy of State's certifying order attached? ☐ Yes ☐ No ☐ N/A

SECTION III: Commercial Operation Date

Please provide documentation to support all claims and responses to the following questions:

3.1 Date that site first entered commercial operation with existing equipment: December 31, 1983

Anticipated date of commencement for Repowered New Generation Units and other upgrades: December 31, 2022

If the commercial operation date is after December 31, 1997, please provide independent verification, such as the utility log or metering data, showing that the meter first spun after December 31, 1997. This is needed in order to verify that the facility qualifies as a New Renewable Energy Resource.

Documentation attached? ☒ Yes ☐ No ☐ N/A

The repowered generation unit will first spin after December 31, 1997. Since this is a declaratory ruling and the repowering/rehabilitation will be completed over the next three years. See attachments.

3.2 Is there an Existing Renewable Energy Resource located at the site of Generation Unit?

☒ Yes
☐ No

3.3 If the date entered in response to question 3.1 is earlier than December 31, 1997 or if you checked "Yes" in response to question 3.2 above, please complete Appendix C.

Appendix C completed and attached? ☒ Yes ☐ No ☐ N/A

3.4 Was all or any part of the Generation Unit used on or before December 31, 1997 to generate electricity at any other site?

☐ Yes
☒ No

3.5 If you checked "Yes" to question 3.4 above, please specify the power production equipment used and the address where such power production equipment produced electricity (attach more detail if the space provided is not sufficient):

SECTION IV: Metering

4.1 Please indicate how the Generation Unit's electrical energy output is verified (check all that apply):

- ☒ ISO-NE Market Settlement System
- ☐ Self-reported to the NEPOOL GIS Administrator
- ☐ Other (please specify below and see Appendix D: Eligibility for Aggregations):

Appendix D completed and attached? ☐ Yes ☐ No ☒ N/A

SECTION V: Location

5.1 Please check one of the following that apply to the Generation Unit:

- ☒ Grid Connected Generation
- ☐ Off-Grid Generation (not connected to a utility transmission or distribution system)
- ☐ Customer Sited Generation (interconnected on the end-use customer 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)

5.2 Generation Unit address: 1485 High St, Central Falls, RI 02863

5.3 Please provide the Generation Unit's geographic location information:

A. Universal Transverse Mercator Coordinates: N Hemisphere, 19T, 301749E, 4641361N
B. Longitude/Latitude: 41°53'57.86"N / 71°23'23.16"W

5.4 The Generation Unit located: (please check the appropriate box)

- ☒ In the NEPOOL control area
- ☐ In a control area adjacent to the NEPOOL control area
- ☐ In a control area other than NEPOOL which is not adjacent to the NEPOOL control area ← *If you checked this box, then the generator does not qualify for the RI RES – therefore, please do not complete/submit this form.*

5.5 If you checked "In a control area adjacent to the NEPOOL control area" in Section 5.4 above, please complete Appendix E.

Appendix E completed and attached? ☐ Yes ☐ No ☒ N/A

SECTION VI: Certification

6.1 Please attach documentation, using one of the applicable forms below, demonstrating the authority of the Authorized Representative indicated in Section 1.8 to certify and submit this Application.

Corporations

If the Owner or Operator is a corporation, the Authorized Representative shall provide **either**:

(a) Evidence of a board of directors vote granting authority to the Authorized Representative to execute the Renewable Energy Resources Eligibility Form, **or**

(b) A certification from the Corporate Clerk or Secretary of the Corporation that the Authorized Representative is authorized to execute the Renewable Energy Resources Eligibility Form or is otherwise authorized to legally bind the corporation in like matters.

Evidence of Board Vote provided? ☒ Yes ☐ No ☐ N/A

Corporate Certification provided? ☐ Yes ☒ No ☐ N/A

Individuals

If the Owner or Operator is an individual, that individual shall complete and attach APPENDIX A, or a similar form of certification from the Owner or Operator, duly notarized, that certifies that the Authorized Representative has authority to execute the Renewable Energy Resources Eligibility Form.

Appendix A completed and attached? ☐ Yes ☐ No ☒ N/A

Non-Corporate Entities

(Proprietorships, Partnerships, Cooperatives, etc.) If the Owner or Operator is not an individual or a corporation, it shall complete and attach APPENDIX B or execute a resolution indicating that the Authorized Representative named in Section 1.8 has authority to execute the Renewable Energy Resources Eligibility Form or to otherwise legally bind the non-corporate entity in like matters.

Appendix B completed and attached? ☐ Yes ☐ No ☒ N/A

6.2 Authorized Representative Certification and Signature:

I hereby certify, under pains and penalties of perjury, that I have personally examined and am familiar with the information submitted herein and based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties, both civil and criminal, for submitting false information, including possible fines and punishment. My signature below certifies all information submitted on this Renewable Energy Resources Eligibility Form. The Renewable Energy Resources Eligibility Form includes the Standard Application Form and all required Appendices and attachments. I acknowledge that the Generation Unit is obligated to and will notify the Commission promptly in the event of a change in a generator's eligibility status (including, without limitation, the status of the air permits) and that when and if, in the Commission's opinion, after due consideration, there is a material change in the characteristics of a Generation Unit or its fuel stream that could alter its eligibility, such Generation Unit must be re-certified in accordance with Section 9.0 of the RES Regulations. I further acknowledge that the Generation Unit is obligated to and will file such quarterly or other reports as required by the Regulations and the Commission in its certification order. I understand that the Generation Unit will be immediately de-certified if it fails to file such reports.

Signature of Authorized Representative:

SIGNATURE: DATE: 7/10/2020

Robert Leahy
Chief Operating Officer
The Shoreline Corporation
Management Agent for Blackstone Hydro Associates, LLC

BLACKSTONE HYDRO ASSOCIATES

APPLICATION FOR ELIGIBILITY OF CENTRAL FALLS HYDROELECTRIC PROJECT AS A NEW RENEWABLE ENERGY RESOURCE

Standard Application Appendices

Appendix A: Not Applicable
Appendix B: Not Applicable
Appendix C: Attached Renewable Energy Resources Eligibility Form
Appendix D: Not Applicable

Additional Application Attachments

Attachment A: FERC License Re-License Application and Associated Documents
Attachment B: Project Description
Attachment C: Project Tax Basis
Attachment D: Evidence of Board of Directors Vote Transferring Authority to Authorized Representative to Execute the Renewable Energy Resources Eligibility Form.

BLACKSTONE HYDRO ASSOCIATES, LLC

APPLICATION FOR ELIGIBILITY OF CENTRAL FALLS HYDROELECTRIC PROJECT AS A NEW RENEWABLE ENERGY RESOURCE

ATTACHMENT A – FERC LICENSE RE-LICENSE APPLICATION AND ASSOCIATED DOCUMENTS

The FERC documents are substantial in size and are the result of years of engineering analysis, environmental studies and Agency consultation. These documents are available by request. Electronic submittal is preferred if possible.

BLACKSTONE HYDRO ASSOCIATES

APPLICATION FOR ELIGIBILITY OF CENTRAL FALLS HYDROELECTRIC PROJECT AS A NEW RENEWABLE ENERGY RESOURCE

ATTACHMENT B – PROJECT DESCRIPTION

Project Description

The Central Falls Hydroelectric Project (CF) is located on the main stem of the Blackstone River in Central Falls Rhode Island. The site was originally constructed in the mid 1800's as a hydro mechanical powered manufacturing facility. The original manufacturing operation was shuttered in the mid 1900's and the original hydropower abandoned. The site was repowered in the mid 1980's. A FERC license (P-3063) was applied for and received. The adjacent mill complex was transformed into senior housing and two hydroelectric units with fixed blade propellers were installed in a powerhouse.

The existing FERC license expires in 2021 and Blackstone Hydro Associates, LLC (BH) has applied for a new FERC license. As part of this licensing process, BH is proposing to replace the two (2) existing fixed blade propeller turbine generator units and repower them with two (2) new single regulated, variable pitch propeller turbine generator units. In addition, a new minimum flow turbine generator will be installed to provide generation using environmental protection flows while providing safe downstream passage for fish. The Project will continue to operate as run-of-river. No store and release operations exist or are proposed. No new impoundment or water diversion is proposed with the project.

The current site turbines are unregulated. This means that the units are either on at their full capacity or off. There is no range in the generation capabilities of the units or ability to track river flows. The existing units do not have wicket gates or movable turbine blades. Due to the non-existing range of the existing turbines, both units will be replaced to provide range. The range will greatly increase power production at the site due to being able to turn the units down below maximum capacity.

Unit One (Semi-Kaplan) (farthest from the river) will have its fixed blade propeller replaced with a single regulated, variable pitch propeller which will allow flow adjustment below maximum turbine capacity. Unit Two (Semi-Kaplan) (closest from the river) will have its fixed blade propeller replaced with a single regulated, variable pitch propeller which will allow flow adjustment below maximum turbine capacity.

The existing turbine propeller (Prime Movers), turbine shaft (supporting structure), turbine bearing (supporting structure), gearboxes, and generator will be removed from the powerhouse. Two new turbine runners, turbine blade actuators, turbine bearings, and shafting from the turbine to the gearboxes will be installed in the existing flow conveyance system. The existing generators and gearboxes will be removed and either completely disassembled and remanufactured or replaced depending on final cost.

The bypass reach flow is discharged at the dam and is not utilized to produce power. Not only has this flow not been historically available for generation but through the FERC process will be significantly increased. A new bypass flow turbine will be installed to harness the minimum bypass flows and to provide downstream fish passage by utilizing a fish friendly turbine. BHA has proposed utilizing a single, 160 KW, fish friendly, minimum flow turbine located approximately 215' downstream of the dam on the right bank. This will be a brand new turbine/generator installation.

Other work is included with the turbine upgrades. To enhance downstream fish passage while maximizing energy production, a new trashrack structure will be constructed just downstream of the gatehouse thereby providing an increase in environmental protection for the Blackstone River. The structure will have a horizontal angle between the canal wall and the racks of 30° and have a total length of 60'. The structure will be split into two sections to direct flow at the rack between the fish friendly minimum flow turbine and the two main turbines. The trash rack bars will be installed vertically and have a wetted depth of 14'. This design has been discussed in consultation with RIDEM and USF&WS. An automatic trash rake will be installed at the new intake and operated in conjunction with a PLC control system. In addition to the turbine upgrades, this reduction in trash loading and headloss will provide a significant increase in annual generation.

Further information on the proposed plan are provided in the FERC relicense application and associated documents which are available on request as noted in Attachment A.

Annual Energy Efficiency/Annual Energy (kWh)

The existing turbines are unregulated propeller units. The units are either on or off at the nameplate capacity. As the river flows fall, the lack of unit range means that there are large gaps where the units cannot run, even though there is significant flow to run. The installation of new variable pitch turbines will allow the site to turn down below its maximum power and hydraulic capacity. This will allow the site to track the river and efficiently use the available resource. This upgrade provides a significant increase in energy efficiency as compared to historic conditions.

The existing site discharges the bypass reach minimum flow at the dam and does not utilize this for generation. The proposed minimum flow unit will utilize the environmental bypass flow to produce power. The turbine is a fish friendly unit that will pass aquatic species through the actual turbine. Utilizing this flow for generation, instead of discharging the flow will be significantly more efficient.

Lastly, the installation of the new trashrack and automatic trashrake will increase unit availability and decrease system headlosses. Analysis of the site's historic production records and speaking to the site operator show that the site has heavy winter ice accumulation and significant organic debris year-round. Observation of the existing units running with no debris accumulation show that there is 0.5'-1.0' of headloss across the intake structure during normal operations. Moving the trashrack upstream and installing an automatic trashrake will reduce these inefficiencies and allow the site to make more energy.

Based upon power production records for 2015 to 2019, the project generated an average annual energy generation of 1,230,000 kWh.

It is estimated with an excel daily production model based upon 2009 to 2019 water years and the proposed three turbine configuration, that post-upgrade the project will make approximately 3,200,000 kWh/yr. This increase in power production is a result of various planned project upgrades including the new variable pitch Kaplan turbines, new minimum flow turbine, new intake, and automatic trashrake as detailed above.

Based upon this it is anticipated that the site will be able to demonstrate a "material increase in efficiency" by better utilizing water with the new turbines, increase the hydraulic operating range of the site to increase production, and by providing ancillary equipment and structures (new intake, trashrake, debris sluice, etc) that will reduce system losses.

The projected increase in annual power production and total site efficiency is approximately 260% (=proposed average kWh-year/existing average kWh-year, =3,200,000kWh/1,230,000 kWh) from the existing to the proposed site. The proposed site power production was estimated from a daily excel model of the site physical constraints combined with USGS river flows to illustrate the 2014 to 2018 average power production. Actual future river flows and generation at the proposed site will vary from this estimate. Based upon this, the applicant feels that the site will show a material increase in its annual power generation and total efficiency of at least 10% from existing to proposed.

Capital Investment

The Central Falls Project was repowered in 1982 and regular operations and maintenance expenditures (currently about $55,000 per year) have been made since that time. It is

anticipated that investments in generating equipment, environmental upgrades, debris management, and improvements to gates on the northern side of the project will cost an estimated $4,200,000.

The tax basis of the site for the most recent IRS filed tax year (2019) is $7,980. This is supported by Attachment C. Based upon this and the anticipated investment of $4,200,000 the completed repowered Generation Unit can demonstrate that more than 80% (100%) of its resulting tax basis of the entire Generation Unit's plant and equipment is derived from capital expenditures made after December 31, 1997.

Repowered Generation Unit Regulatory Review

Based upon our review of 810-RICR-40-05-2 and the Lyons Falls RIPUC docket number 4624 the proposed unit replacement of the existing units qualifies as "Repowered Generation Units". Therefore the entire output of the proposed facility will qualify as a new generation resource.

"810-RICR-40-05-2.3 A 23. "New Renewable Energy Resources" specifies several paths to qualify as a New Renewable Energy Resource. Central Falls is pursuing 810-RICR-40-05-2.3 A 23 Paragraph C. This states, "the entire output of a Repowered Generation Unit which uses Eligible Renewable Energy Resources and such Repowered Generation Unit first entered commercial operation after December 31, 1997 at the site of an existing Generation Unit; or".

The first requirement of the repowered generation unit is that the prime mover is completely replaced. Based upon a review of the Lyons Falls (hydropower Project) Docket, the Lyons Falls Project was certified as a New Repower Generation Unit by replacing the turbine runner, turbine shaft (which supports the runner), and first bearing of their generation units. Central Falls will be replacing the turbine runner, turbine shaft (which supports the runner) and first bearing of the generation unit, in addition to other upgrades to ancillary equipment discussed above. Therefore, Central Falls is meeting or exceeding the requirement for prime mover replacement and repowered generation unit.

The second requirement of repowered generation unit is that the unit has a material increase in efficiency. There will be a material increase in efficiency of the Central Falls Project as discussed above.

The third requirement of the repowered generation unit is that it must show 80% of its resulting tax basis of the entire generation units plant and equipment is derived from capital expenditure made after December 31, 1997. This is absolutely the case at the Central Falls Project.

Although there is existing hydroelectric generation the facility, it requires a complete overhaul for continued generation as described above. And the Project meets the requirements such that the entirety of the energy output of the future project will be new generation resource.

BLACKSTONE HYDRO ASSOCIATES

APPLICATION FOR ELIGIBILITY OF CENTRAL FALLS HYDROELECTRIC PROJECT AS A NEW RENEWABLE ENERGY RESOURCE

ATTACHMENT C – PROJECT TAX BASIS

See line 9b, Column (d) of the attached page 5 of the Blackstone Hydro Associates Form 1065 for 2019.

Analysis of Net Income (Loss)

1 Net income (loss). Combine Schedule K, lines 1 through 11. From the result, subtract the sum of Schedule K, lines 12 through 13d, and 16p	1	-9,173.

2 Analysis by partner type:	(i) Corporate	(ii) Individual (active)	(iii) Individual (passive)	(iv) Partnership	(v) Exempt Organization	(vi) Nominee/Other
a General partners	-9,173.					
b Limited partners						

Schedule L Balance Sheets per Books

Assets	Beginning of tax year (a)	Beginning of tax year (b)	End of tax year (c)	End of tax year (d)
1 Cash		16,295.		10,238.
2a Trade notes and accounts receivable	32,569.		19,976.	
b Less allowance for bad debts		32,569.		19,976.
3 Inventories				
4 U.S. government obligations				
5 Tax-exempt securities				
6 Other current assets (attach statement)	STATEMENT 3	6,867.		6,867.
7a Loans to partners (or persons related to partners)				
b Mortgage and real estate loans				
8 Other investments (attach statement)				
9a Buildings and other depreciable assets	1,429,736.		1,438,636.	
b Less accumulated depreciation	1,428,680.	1,056.	1,430,656.	7,980.
10a Depletable assets				
b Less accumulated depletion				
11 Land (net of any amortization)				
12a Intangible assets (amortizable only)	72,701.		218,787.	
b Less accumulated amortization	24,905.	47,796.	24,905.	193,882.
13 Other assets (attach statement)	STATEMENT 4	55,467.		55,467.
14 Total assets		160,050.		294,410.
Liabilities and Capital				
15 Accounts payable		57.		
16 Mortgages, notes, bonds payable in less than 1 year				
17 Other current liabilities (attach statement)	STATEMENT 5	1,153,869.		1,297,459.
18 All nonrecourse loans				
19a Loans from partners (or persons related to partners)				
b Mortgages, notes, bonds payable in 1 year or more				
20 Other liabilities (attach statement)				
21 Partners' capital accounts		-993,876.		-1,003,049.
22 Total liabilities and capital		160,050.		294,410.

Schedule M-1 Reconciliation of Income (Loss) per Books With Income (Loss) per Return

Note: The partnership may be required to file Schedule M-3. See instructions.

1 Net income (loss) per books	-9,173.	6 Income recorded on books this year not included on Schedule K, lines 1 through 11 (itemize): a Tax-exempt interest $	
2 Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this year (itemize):			
3 Guaranteed payments (other than health insurance)		7 Deductions included on Schedule K, lines 1 through 13d, and 16p, not charged against book income this year (itemize): a Depreciation $	
4 Expenses recorded on books this year not included on Schedule K, lines 1 through 13d, and 16p (itemize): a Depreciation $		8 Add lines 6 and 7	
b Travel and entertainment $		9 Income (loss) (Analysis of Net Income (Loss), line 1). Subtract line 8 from line 5	-9,173.
5 Add lines 1 through 4	-9,173.		

Schedule M-2 Analysis of Partners' Capital Accounts

1 Balance at beginning of year	-993,876.	6 Distributions: a Cash	
2 Capital contributed: a Cash		b Property	
b Property		7 Other decreases (itemize):	
3 Net income (loss) per books	-9,173.		
4 Other increases (itemize):		8 Add lines 6 and 7	
5 Add lines 1 through 4	-1,003,049.	9 Balance at end of year. Subtract line 8 from line 5	-1,003,049.

BLACKSTONE HYDRO ASSOCIATES

APPLICATION FOR ELIGIBILITY OF CENTRAL FALLS HYDROELECTRIC PROJECT AS A NEW RENEWABLE ENERGY RESOURCE

ATTACHMENT D – EVIDENCE OF BOARD OF DIRECTORS VOTE TRANSFERING AUTHORITY TO AUTHORIZED REPRESENTATIVE TO EXECUTE THE RENEWABLE ENERGY RESOURCES ELIGABILITY FORM

CONSENT TO ACTION OF DIRECTORS WITHOUT A MEETING
OF
BH CORP.

The undersigned, being the directors of BH CORP., Managing Member of Blackstone Hydro Associates, LLC, hereby consent to the adoption of the following votes without a meeting of the Directors and to the taking of any and all actions contemplated therein or thereby:

VOTED: That the Corporation, acting in its capacity as Managing Member of Blackstone Hydro Associates, LLC, is hereby authorized on Blackstone Hydro's behalf to enroll under the National Grid Renewable Energy Growth Program and to execute any and all documents required by National Grid and the Rhode Island Public Utilities Commission (RIPUC) in connection therewith.

VOTED: That, Robert J. Leahy, as Chief Operating Officer of The Shoreline Corporation, Management agent for Blackstone Hydro Associates, LLC, is authorized to execute any necessary forms or documents required by National Grid or RIPUC to effectuate enrollment as a Repowered New Renewable Energy eligible for full benefits under the National Grid Renewable Energy Growth Program.

IN WITNESS WHEREOF, we have hereunto set our hands intending this consent to become effective as of this 7th day of July, 2020.

SIMEON BRUNER
President and Director

LELAND COTT
Vice President and Director