



July 20, 2020

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

RE: Rhode Island Renewable Energy Resources Eligibility Form for GD Hopkinton Main I, LLC (Array #3)

Dear Mrs. Massaro;

Green Development, LLC ("Green") is submitting the Standard Application Form for Prospective Certification (Declaratory Judgement) for Certification of Eligibility of Renewable Energy Resource for a 4.125 MW AC solar array situated in Hopkinton, RI owned by GD Hopkinton Main I, LLC (the "Project"). One (1) original and three (3) copies of the eligibility form have been enclosed.

The attached application contains two areas that will be updated at a later date:

- Section 2.1: NEPOOL GIS Identification Number
This number will be provided to the PUC upon issuance by NEPOOL GIS.
- Section 3.1: Commercial Operation Date
The Project is expected to achieve a Commercial Operation Date ("COD") on or around August 30, 2020. The actual COD will be provided once it is met.

Please contact Matt Sullivan if any additional information is needed. He is available at (401) 295-4998 or by email at ms@green-ri.com.

Thank you,

A handwritten signature in black ink, appearing to read "Mark DePasquale", with a long horizontal flourish extending to the right.

Mark DePasquale
CEO
Green Development, 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):

GD Hopkinton Main I, LLC (Array 3)

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: Matthew Sullivan: Business Development Analyst

Green Development, LLC

1.5 Primary Contact Person address and contact information:

Address: 2000 Chapel View Blvd. Suite 500, Cranston, RI 02920

Phone: 401-295-4998

Fax: 401-295-4944

Email: ms@green-ri.com

1.6 Backup Contact Person name and title: Mark DePasquale: CEO

Green Development, LLC

1.7 Backup Contact Person address and contact information:

Address: 2000 Chapel View Blvd. Suite 500, Cranston, RI 02920

Phone: 401-295-4998

Fax: 401-295-4944

Email: md@green-ri.com

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.

1.8 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):

Mark DePasquale: CEO

Green Development, LLC

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

1.9 Authorized Representative address and contact information:

Address: 2000 Chapel View Blvd. Suite 500, Cranston, RI 02920

Phone: 401-295-4998

Fax: 401-295-4944

Email: md@green-ri.com

1.10 Owner name and title: GD Hopkinton Main I, LLC (Mark DePasquale: CEO)

1.11 Owner address and contact information:

Address: 2000 Chapel View Blvd. Suite 500, Cranston, RI 02920

Phone: 401-295-4998

Fax: 401-295-4944

Email: md@green-ri.com

1.12 Owner business organization type (check one):

Individual

Partnership

Corporation

Other: Rhode Island Limited Liability Company

1.13 Operator name and title: Green Development, LLC (Mark DePasquale: CEO)

1.14 Operator address and contact information:

Address: 2000 Chapel View Blvd. Suite 500, Cranston, RI 02920

Phone: 401-295-4998

Fax: 401-295-4944

Email: md@green-ri.com

1.15 Operator business organization type (check one):

Individual

Partnership

Corporation

Other: Rhode Island Limited Liability Company

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): PENDING

2.2 Generation Unit Nameplate Capacity: 4.125 MW AC MW

2.3 Maximum Demonstrated Capacity: 4.125 MW AC MW

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

2.8 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 Generation Unit first entered Commercial Operation: ___ / ___ / ___ at the site.

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? PENDING Yes No N/A

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: 310 Main Street, Hopkinton, RI 02804

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

A. Universal Transverse Mercator Coordinates: 19 T 267902.57 m E 4591106.47 m N

B. Longitude/Latitude: 71°46'41.03"W / 41°26'16.80"N

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:

7/21/20

Mark DePasquale: CEO

(Title)

GIS Certification #: _____

**APPENDIX B
(Required When Owner or Operator is a Non-Corporate Entity
Other Than An Individual)**

**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**

RESOLUTION OF AUTHORIZATION

Resolved: that Mark DePasquale, named in Section 1.8 of the Renewable Energy Resources Eligibility Form as Authorized Representative, is authorized to execute the Application on the behalf of GD Hopkinton Main I, LLC, the Owner or Operator of the Generation Unit named in section 1.1 of the Application.

SIGNATURE: [Signature] DATE: 7/21/20

State: Rhode Island
County: Providence

(TO BE COMPLETED BY NOTARY) I, Kady R. Adams as a notary public, certify that I witnessed the signature of the above named Mark DePasquale and that said person stated that he/she is authorized to execute this resolution, and the individual verified his/her identity to me, on this date: July 21, 2020.

SIGNATURE: [Signature] DATE: 7/21/20

My commission expires on: 2/26/22

NOTARY SEAL:

**KADY ADAMS
Notary Public, State of Rhode Island
My Commission Expires Feb. 26, 2022**



GIS Certification #:

**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.

310 Main Street, Hopkinton, RI 02804 (Plat 4, Lot 25)

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.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.

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

RENEWABLE ENERGY 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, CEO
GD Hopkinton Main I, LLC
2000 Chapel View Blvd. Suite 500,
Cranston, RI 02920
401-295-4998
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 Hopkinton Main 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.