

**State of Rhode Island Public Utilities Commission**

**In re: Hexagon Energy, LLC Petition for Declaratory Judgment**

**Docket No. 5060**

**Supplemental Pre-Filed Testimony of**

**Buzz Becker**

**September 8, 2020**

**I. Introduction and Qualifications**

1 **Q. Please state your name and business address.**

2 A. My name is William (Buzz) Becker and my business address is 722 Preston Ave,  
3 Suite 102 Charlottesville, Virginia 22903. I adopt the description of my employment,  
4 professional background, and relationship with the proposed projects from my earlier  
5 Testimony submitted to the Commission on September 3, 2020.

6 **II. How would you like to supplement your prefiled testimony of September 4, 2020?**

7 A. The Commission has asked me to incorporate the factual assertions from our petition  
8 made in this docket, so this supplement does so. On August 13, 2020, Hexagon Energy,  
9 LLC (“Hexagon”) filed with the Commission a Petition for Declaratory Judgment  
10 requesting the Commission to determine that Hexagon is not violating the prohibition  
11 against segmentation in the Renewable Energy Growth 2020 tariff (the “Tariff”).

12 As previously attested, Hexagon proposes two projects in Burrillville, Rhode  
13 Island. The first project (d/b/a Superior Solar LLC), located on the eastern parcel (AP  
14 113, Lot 012 – 0 Victory Hwy), is a 991 kW, ground-mounted solar array. On December  
15 23, 2019, National Grid awarded Superior Solar a Certificate of Eligibility (the  
16 “Certificate”) in the third enrollment period of the 2019 Renewable Energy Growth  
17 (“REG”) program. Pursuant to the Certificate, Superior Solar was selected to generate  
18 electricity at a price of 20.44¢/kWh for a 20-year term. The Certificate designated  
19 Superior Solar’s renewable energy class as CRDG Commercial Solar. On June 2, 2020,  
20 the Commission approved Superior Solar’s Certificate, effective January 15, 2020. *See*  
21 PUC Order No. 23833.

1           The second project (d/b/a Semistream Solar LLC, a/k/a Sparrow Solar) is planned  
2 to be sited on the western parcel (AP 113, Lot 011 – 2205 Bronco Hwy). Semistream  
3 Solar will also be a 991 kW carport constructed over the landowner’s existing truck  
4 parking location. Semistream Solar intends to pursue the carport adder under the new  
5 pilot program incorporated into the 2020 REG program. The carport project is eligible  
6 for the carport adder as it meets the definition of “solar carport” established by National  
7 Grid, the Office of Energy Resources, and the Distribution Generation Board. Hexagon  
8 must submit a competitive bid for the Semistream Solar carport project in the  
9 Commercial Solar enrollment class before separately requesting the carport adder in the  
10 second or third enrollment periods. But for the carport adder pilot program, Hexagon  
11 would not have pursued this subsequent project on the adjacent parcel to the Superior  
12 Solar project.

13           Hexagon does not believe it is violating the Tariff’s prohibition. The two projects  
14 were neither proposed contemporaneously nor purposely separated to benefit from  
15 greater ceiling prices. Superior Solar categorically fits into the Community Remote  
16 Commercial Solar enrollment class and appropriately bid into that class in the 2019 REG  
17 program—with the ceiling price of 20.99¢/kwh. Hexagon, at that time, did not  
18 contemplate the subsequent Semistream Solar carport project as it would not have been  
19 economically viable absent the newly created carport adder. Hexagon has made good  
20 faith efforts to comport with the guidelines in the Tariff and to achieve the public policy  
21 objectives of the Renewable Energy Growth program.

1 I have also has consulted with National Grid regarding this segmentation issue  
2 initially in late January 2020 and subsequently on multiple occasions in June through  
3 August to determine the best avenue to resolve the issue. While National Grid does not  
4 see these as improperly segmented projects and indicated no objection to Hexagon's  
5 petition, it indicated that it lacks discretion to interpret the tariff and, therefore, may not  
6 be able to approve the enrollment of both projects in the REG program.

7 **Q. Does this conclude your supplemental testimony?**

8 Yes.

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