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PUBLIC UTILITIES COMMISSION

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June 25, 2021

Via Electronic Filing

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

RE: Farmington Solar, LLC; Renewable Energy Standard Certification Application

Dear Ms. Massaro:

I am writing on behalf of Farmington Solar, LLC (“Farmington”) in connection with the above-referenced RES application for prospective certification of Farmington as a Renewable Energy Resource (“Application”). Farmington’s anticipated commercial operation date is September 1, 2021.

As more particularly discussed below, Farmington asks that the Rhode Island Public Utilities Commission (“Commission”) modify its requirement that applicants for Renewable Energy Resource certification provide written documentation verifying commercial operation before the Commission provides a unique Rhode Island Public Utilities Commission Eligible Renewable Energy Resource Facility Certification number (“Certification Number”). Specifically, Farmington requests an order from the Commission granting conditional approval of the Application wherein Farmington receives a Certification Number for the project.

The Farmington project was selected in response to the 2015 Request for Proposals (“RFP”) developed by the Narragansett Electric Company d/b/a National Grid and the Rhode Island Office of Energy Resources in coordination with the states of Connecticut and Massachusetts (the “Tri-State RFP”).¹ The Commission approved the power purchase agreement (“PPA”) associated with the project in its April 9, 2018 Order 23102 (“Order”) issued in Docket No. 4764, The Narragansett

¹ See Docket No. 4570, National Grid - Solicitation for Proposals for Clean Energy Projects Pursuant to R.I. Gen. Laws §39-31-6(a)(1)(i), Order 22365 (March 23, 2016); R.I.G.L. §39-31-4(a)(1) and (a)(2).

Electric Co. d/b/a National Grid - Review of Purchase Power Agreements (PPA) Pursuant to R.I. Gen. Laws 39-26.1.²

The Commission's "Standard Application Form Required of all Applicants for Certification of Eligibility of Renewable Energy Resource" requires that the generation facility indicate the date it first entered commercial operation.³ Farmington is not currently operational and will not be until approximately September 1, 2021. However, the Commission has already reviewed the merits of the Farmington project and determined in the Order that its approval was consistent with the Rhode Island's energy and environmental goals and policies established in the Long-Term Contracting for Renewable Energy Standards Act.⁴

Accordingly, modification of the commercial operation requirement is appropriate as a matter of public policy, as the Farmington PPA has already been reviewed and approved by the Commission. If Farmington is approved as meeting the eligibility requirements of the RI RES as a Renewable Energy Resource, Farmington requests that the Commission's order include a unique RI certification number along with the regular conditions regarding need for documentation supporting actual achievement of commercial operation. The Certification Number is a critical component for the project's financial partners. Farmington has already received an ISO-NE Generation Unit Asset Identification number (#69786),⁵ documentation of which is attached. Farmington suggests that the Commission's conditional order could include a requirement that failure to submit sufficient documentation of commercial operation no later than December 31, 2021 will result in decertification of the facility.

Farmington is the product of unique circumstances and therefore seeks a unique remedy. Farmington acknowledges that advanced issuance of a Certification Number within a conditional order from the Commission is a change from typical Commission protocol.⁶ However,

² As demonstrated on Page 4 of Order 23102, Farmington's original nameplate capacity was 49.36 MW. Since that time, the project has been redesigned and now has a nameplate capacity of 76.53 MW. Farmington has included the project's current nameplate capacity on the Application.

³ Standard Application Form Required of all Applicants for Certification of Eligibility of Renewable Energy Resource at 6.

⁴ R.I. Gen. Laws §§ 39-26.1-1 to 5.

⁵ Concurrently with this filing, Farmington will file to update its ISO-NE Generation Unit Asset Identification number (#69786) with Connecticut Public Utilities Regulatory Authority ("PURA"). This filing is noted given that PURA's approval of Farmington as qualifying as a Class I renewable energy resource, effective July 1, 2019, is attached to the Application.

⁶ Sanford Airport Solar, LLC ("Sanford") was likewise approved by the Commission in the Order. However, the Commission's order approving Sanford's application in Docket No. 5068 provided a conditional approval, with the Certification Number to be provided upon production of evidence of commercial operations and NEPOOL GIS Asset Identification Number designation. Farmington seeks to obtain the number in the order conditionally approving the

Luly E. Massaro
June 25, 2021
Page 2

Farmington hopes that the Commission agrees that such a change is appropriate under the unique circumstances of the Commission's previous approval of the facility through the Tri-State RFP. Moreover, the Connecticut Public Utilities Regulatory Authority ("Authority") modified its certification process for Class I renewable energy resources in response to a similar request made by Farmington. The Authority certified Farmington in Docket No. 19-10-39 even though Farmington had yet to reach commercial operation, noting its previous review of the facility in the state's Tri-State RFP. A copy of the certification decision is attached to the Application.

Wherefore, Farmington respectfully requests that the Commission waive the requirement that it be operating as a condition of certification as a renewable energy resource, for good cause shown. Farmington understands that Commission approval of the proposed modification will be limited to its unique circumstances. Farmington requests that such certification be effective as of July 30, 2021, the date on which Farmington is expected to begin generating test energy. Should the Commission be unable to issue a conditional order by July 30, 2021, Farmington requests that the Commission do so by the expected commercial operation date, September 1, 2021.

Thank you for your anticipated consideration and understanding. Please feel free to contact the undersigned or Brian J. Murphy of Farmington Solar, LLC at 561-694-3814, brian.j.murphy@nexteraenergy.com, should you have any questions regarding this submission.

Sincerely,

/s/ Krystle Tadesse

Krystle Tadesse

Enclosure

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Application, with the caveat that the number can be withdrawn should evidence of commercial operation not be provided by December 31, 2021.

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 9 – April 19, 2021)**

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION
Pursuant to the Renewable Energy Act
Title 810, Chapter 40, Subchapter 05, Part 2 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 Public Utilities Commission Rules and Regulations Governing the Implementation of a Renewable Energy Standard [810-RICR-40-05-2 \(RES Rules\)](#), and the associated RES Certification Filing Methodology Guide. All applicable regulations, procedures and guidelines are available on the Commission’s web site: www.ripuc.ri.gov/utilityinfo/res.html.
- Please submit one original 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
- Electronic submittals are also required and should be sent to Res.filings@puc.ri.gov.
- In addition to filing with the Commission, Applicants are required to send an electronic copy of the application and supporting documents to the service list located at <http://www.ripuc.ri.gov/utilityinfo/reslist.doc>.
- Keep a copy of the completed Application for your records.
- The Commission will notify the Authorized Representative if the Application is incomplete.
- Pursuant to RES Rules Section 2.6(A)(3), the Commission shall provide a thirty (30) day period for public comment following posting of any administratively complete Application. All information submitted with the Application is considered to be a public record unless the Commission deems some portion of the application confidential after consideration under [Rules of Practice and Procedure 810-RICR-00-00-1](#), Section 1.3(H)(3). It is the applicant’s responsibility to request confidential treatment and to provide redacted copies to the Commission and the service list.
- Questions related to this Renewable Energy Resources Eligibility Form can be submitted to Res.filings@puc.ri.gov.

SECTION I: Identification Information

- 1.1 Name of Generation Unit (sufficient for full and unique identification, and consistent with the Generation Unit name listed on the NEPOOL GIS, if currently listed):

Farmington Solar

- 1.2 Type of Certification being requested (note: if the Generation Unit has not yet achieved Commercial Operation, check Prospective Certification/Declaratory Judgement):

- Standard Certification
 Prospective Certification (Declaratory Judgment)

- 1.3 This Application includes: (Check *all and only* those that apply)

- Appendix A: Authorized Representative Certification for Individual Owner
 Appendix B: Authorized Representative Certification for Non-Corporate Entities Other Than Individuals, including Limited Liability Companies (LLC)
Note: Please refer to Section 6.1, Corporations, for required evidence certifying Authorized Representative.
 Appendix C: Existing Renewable Energy Resources
 Appendix D: Special Provisions for Aggregators of Customer-sited, Off-grid Generation, or RI-sited Remote Net Metered Facilities
 Appendix E: Special Provisions for a Generation Unit Located in a Control Area Adjacent to NEPOOL
 Appendix F: Fuel Source Plan for Eligible (including Unlisted) Biomass Fuels

- 1.4 Primary Contact Person

Name and title: A. José De Armas, Senior Project Manager

Address: 700 Universe Blvd, Juno Beach, FL 33408

Phone: 647-838-5774

Email: Jose.DeArmas@nexteraenergy.com

- 1.5 Backup Contact Person

Name and title: Keddy Chandran, Director Northeast Development

Address: 700 Universe Blvd, Juno Beach, FL 33408

Phone: 561-691-7274

Email: Keddy.Chandran@nexteraenergy.com

- 1.6 Authorized Representative (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):

Name and title: Anthony Pedroni, Vice President
Company: Farmington Solar, LLC
Address: 700 Universe Blvd, Juno Beach, FL 33408

Phone: 561-304-5622
Email: Anthony.Pedroni@nexteraenergy.com

Appendix A or B, or Corporate Authorization (as appropriate) completed and attached?
 Yes No

1.7 Owner

Name and title: Farmington Solar, LLC
Company: Farmington Solar, LLC
Address: 700 Universe Blvd, Juno Beach, FL 33408

Phone: 647-838-5774
Email: Jose.DeArmas@nexteraenergy.com

1.8 Owner business organization type (check one):

- Individual
 Partnership (including Limited Liability Company and other Non-Corporate Entities)
 Corporation
 Other: LLC

1.9 Operator

Name and title: Farmington Solar, LLC
Company: Farmington Solar, LLC
Address: 700 Universe Blvd, Juno Beach, FL 33408

Phone: 647-838-5774
Email: Jose.DeArmas@nexteraenergy.com

1.10 Operational business organization type (check one):

- Individual
 Partnership (including Limited Liability Company and other Non-Corporate Entities)
 Corporation
 Other: LLC

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

- 2.1 NEPOOL GIS Identification Number (if assigned yet, along with appropriate MSS, NON or IMP designation): 69786
- For facilities enrolled in the RI Renewable Energy Growth Program: National Grid will provide the participant with an MSS ID.
- 2.2 Nameplate Capacity (list AC, and DC if applicable): 76.53 MW AC 115.92 MW DC
- 2.3 Maximum Demonstrated Capacity (list AC, and DC if applicable): 76.53 MW AC 115.92 MW DC
- 2.4 Please indicate which of the following Eligible Renewable Energy Resources are used by the Generation Unit: (Check ALL that apply) – *per RES Rules Section 2.5*
- 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 (*per RES Rules Section 2.3(A)(7)*)
 - Biomass facilities using unlisted biomass fuel (*per RES Rules Section 2.3(A)(7)(a)*)
 - Fuel cells using a renewable resource referenced in this section
- 2.5 For small hydro facilities, please certify that the facility's aggregate capacity does not exceed 30 MW. – *per RES Rules Section 2.3(A)(32)*
- ← check this box to certify that the above statement is true
 - N/A
- 2.6 For 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 Rules Section 2.3(A)(32)*
- ← check this box to certify that the above statement is true
 - N/A
- 2.7 For biomass facilities: Appendix F completed and attached?
- Yes (Please specify fuel or fuels used or to be used in the unit _____)
 - 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," a copy of each state's certifying order is attached?
- ← check this box to certify that the above statement is true

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 or, if not yet in operation, the anticipated Commercial Operation Date:
09 / 01 / 2021

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. For facilities located in Rhode Island, a copy of National Grid’s Authorization to Interconnect letter would also be sufficient. This documentation is needed in order to verify that the facility qualifies as a New Renewable Energy Resource.

Documentation of Commercial Operation Date attached?

- 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 on or 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:
- ISO-NE Market Settlement System
 - Other, including Self-Reported to the NEPOOL GIS Administrator (please specify below and complete Appendix D):

For "Other," Appendix D completed and attached?

- Yes
- No
- N/A

For facilities enrolled in the RI Renewable Energy Growth Program: National Grid will be reporting output to the ISO-NE Market Settlement System.

- 4.2 Please check one of the following that apply to the Generation Unit:
- Grid Connected Generation
 - Connected directly to a utility transmission or distribution system with only station load at the unit site
 - Units participating in the RI Renewable Energy Growth Program fall in this category.
 - Off-Grid Generation
 - Not connected to a utility transmission or distribution system
 - Customer-Sited Generation
 - Connected on the end-use customer side of a retail electricity meter in such a manner that it displaces all or part of the metered consumption of the end-use customer, other than station load
 - Traditional behind-the-meter net metering falls in this category.
 - Units located outside Rhode Island with this configuration will be deemed ineligible by PUC (see RES Rules Section 2.6(H)(1) (see also Order No. 23710, <http://www.ripuc.ri.gov/eventsactions/docket/4858-4891-Kearsarge%20Ord23710%2011-12-2019.pdf>)
 - Remote Customer-Sited Generation
 - Connected directly to the local electric utility distribution grid with only station load
 - All or some of the electrical energy from the unit is designated for use in displacing all or part of the retail electricity metered consumption of one or more end-use customers (including through a transfer of bill credits)
 - "Virtual" and "remote" front-of-the-meter net metering falls in this category.

- o Units located outside Rhode Island with this configuration have been found ineligible by the PUC (see Order 23710, <http://www.ripuc.ri.gov/eventsactions/docket/4858-4891-Kearsarge%20Ord23710%2011-12-2019.pdf>).

SECTION V: Location

- 5.1 Generation Unit address:
 560 Farmington Falls Rd, Farmington, ME, 04948

- 5.2 Please provide the Generation Unit’s geographic location information:
 A. Universal Transverse Mercator Coordinates: 19T 411685 4944121
 B. Longitude/Latitude: 44.64502°N / 70.11368°W
- 5.3 The Generation Unit is 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 is ineligible.*
- 5.4 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, to demonstrate the authority of the Authorized Representative provided in Section 1.6.

Corporations

The Authorized Representative of the Corporation 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.¹

¹ If the Corporation has only one sole Officer, it is acceptable for that Officer to provide signatory certification of same as Authorized Representative.

Evidence of Board Vote provided?

- Yes
- No
- N/A

Corporate Certification provided?

- Yes
- No
- N/A

Individuals

If the Owner is an Individual, that Individual shall complete and attach Appendix A, or a similar form of certification from the Owner, 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

(Limited Liability Companies - LLCs, Proprietorships, Partnerships, Cooperatives, etc.) If the Owner is neither an Individual nor a Corporation, it shall complete and attach Appendix B or execute a resolution indicating that the Authorized Representative named in Section 1.6 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 RES Rules Section 2.6(E). I further acknowledge that the Generation Unit is obligated to and will file such quarterly or other reports as required by the Rules 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:

DATE:



Anthony Pedroni

(Printed Name of Signatory)

Vice President

(Title)

Farmington Solar, LLC

(Company)

GIS Certification #:

APPENDIX A
(Revised 4/19/2021)
(Required when Owner is An Individual)

I, _____, as Owner named in Section 1.7 of the Generation Unit named in Section 1.1 of the attached Renewable Energy Resources Eligibility Form, under the pains and penalties of perjury, hereby certify that _____, named in Section 1.6 of the attached Application, is authorized to execute this Renewable Energy Resource Eligibility Form.

SIGNATURE:

DATE:

(Printed Name of Signatory)

(Title)

(Company)

State: _____

County: _____

(TO BE COMPLETED BY NOTARY) I, _____ as a notary public, certify that I witnessed the signature of the above named _____, and said individual verified his/her identity to me on this date: _____.

SIGNATURE:

My commission expires on: _____

NOTARY SEAL:

GIS Certification #:

APPENDIX B
(Revised 4/19/2021)
(Required When Owner is a Non-Corporate Entity
Other Than An Individual)

RESOLUTION OF AUTHORIZATION

Resolved: that Anthony Pedroni, named in Section 1.6 of the Renewable Energy Resources Eligibility Form as Authorized Representative, is authorized to execute the Application on the behalf of Farmington Solar, LLC, the Owner named in Section 1.7 of the Generation Unit named in Section 1.1 of the Application.

SIGNATURE:

[Handwritten Signature]

DATE:

6/3/2021

Matthew S. Handel

(Printed Name of Signatory)

Vice President

(Title)

Farmington Solar, LLC

(Company)

State: FLORIDA

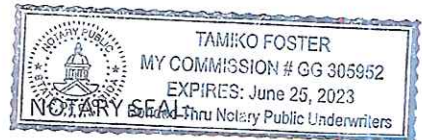
County: PALM BEACH

(TO BE COMPLETED BY NOTARY) I, TAMIKO FOSTER as a notary public, certify that I witnessed the signature of the above named MATTHEW S. HANDEL and said individual verified his/her identity to me on this date: 6/3/2021.

SIGNATURE:

[Handwritten Signature]

My commission expires on: 6/25/2023





STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY
TEN FRANKLIN SQUARE
NEW BRITAIN, CT 06051

**DOCKET NO. 19-10-39 APPLICATION OF FARMINGTON SOLAR, LLC FOR
QUALIFICATION OF 560 FARMINGTON FALLS ROAD,
FARMINGTON, ME AS A CLASS I RENEWABLE ENERGY
SOURCE**

December 11, 2019

DECISION APPROVING CLASS I CERTIFICATION

On October 29, 2019, the Public Utilities Regulatory Authority (Authority) received an application from Farmington Solar, LLC (Company) requesting that the Authority determine that the solar facility (Facility or Project) located at 560 Farmington Falls Road in Farmington, Maine qualifies as a Class I renewable energy source.

The Facility generates electricity using solar power. The Project is not commercially operational and will not be until September 1, 2021. However, the Authority waives this mandatory requirement, as the Facility was selected in response to the 2015 Request for Proposal (RFP) issued by the Department of Energy and Environmental Protection in coordination with the states of Connecticut, Rhode Island and Massachusetts (Tri-State RFP). The RFP sought proposals for Class I renewable energy sources, large-scale hydropower and transmission to secure cost-effective resources to provide more affordable and reliable electric service, consistent with the state's energy and environmental goals and policies established in the 2014 Integrated Resources Plan (IRP) and 2013 Comprehensive Energy Strategy (CES).

The essential purpose of the Tri-State RFP was to identify any projects that offer the potential for the procuring states to meet their clean energy goals in a cost-effective manner consistent with their procuring statutes. The Authority approved the power purchase agreements (PPAs) associated with the projects, including this Facility, in its September 13, 2017 Decision in Docket No. 17-01-10, PURA Review of Public Act 15-107(c) Large Scale Energy Resource Agreements (Large-Scale Decision).

The Authority has already reviewed the merits of the Project and determined in the Large-Scale Decision that its approval was consistent with the State's energy and environmental goals and policies established in the IRP and CES.

The Facility has an installed capacity of 49.36 MW and its Independent System Operator of New England's (ISO-NE) Generation Unit Asset Identification Number is MSS38838. The Project is a grid-connected generation facility located in Maine, which is within the ISO-NE control area.

The Authority reviewed all of the information in the record and finds that pursuant to §16-1(a)(20) of the General Statutes of Connecticut, the Facility qualifies as a Class I renewable energy source, effective July 1, 2019. The Authority assigns the Facility Connecticut Renewable Portfolio Standard Registration No. CT191039.

The Authority's determination in this docket is based on the information submitted by the Company. The Authority may reverse its ruling or revoke the Company's registration if any material information provided proves to be false or misleading. The Company is reminded that it is obligated to notify the Authority within 10 days of any changes to any of the information it has provided.

DOCKET NO. 19-10-39 APPLICATION OF FARMINGTON SOLAR, LLC FOR
QUALIFICATION OF 560 FARMINGTON FALLS ROAD,
FARMINGTON, ME AS A CLASS I RENEWABLE ENERGY
SOURCE

This Decision is adopted by the following Commissioners:

John W. Betkoski, III

Marissa P. Gillett

Michael A. Caron

CERTIFICATE OF SERVICE

The foregoing is a true and correct copy of the Decision issued by the Public Utilities Regulatory Authority, State of Connecticut, and was forwarded by Certified Mail to all parties of record in this proceeding on the date indicated.



Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority

December 11, 2019
Date

Crissman, Kaleigh

From: Jaeger, Kristen <kjaeger@iso-ne.com>
Sent: Friday, June 18, 2021 11:03 AM
To: De Armas, A. Jose
Cc: Ruell, Cheryl; Murphy, Brian J.; Chandran, Keddy; Crissman, Kaleigh; Forbess, Alyssa; Vallejo, Patricia; Gardner, Michelle; Martin, Christopher
Subject: RE: [EXT] Farmington & Quinebaug Generator Asset IDs

Caution - External Email (kjaeger@iso-ne.com)

[Report this Email](#) [Quick response](#) [Emergency response](#) [Tips](#)

Jose,

I can confirm the Asset ID's for the projects are as follows:

Quinebaug Solar: Asset ID 69801
Farmington Maine Solar: Asset ID 69786

ID 69787 was created for Farmington Maine Solar in duplicate and subsequently canceled.

From: De Armas, A. Jose <Jose.A.DeArmas@nexteraenergy.com>
Sent: Friday, June 18, 2021 10:52 AM
To: Jaeger, Kristen <kjaeger@iso-ne.com>
Cc: Ruell, Cheryl <cruell@iso-ne.com>; Murphy, Brian J. <Brian.J.Murphy@nexteraenergy.com>; Chandran, Keddy <Keddy.Chandran@nexteraenergy.com>; Crissman, Kaleigh <Kaleigh.Crissman@nexteraenergy.com>; Forbess, Alyssa <Alyssa.Forbess@nexteraenergy.com>; Vallejo, Patricia <Patricia.Vallejo@nexteraenergy.com>; Gardner, Michelle <Michelle.Gardner@nexteraenergy.com>; Martin, Christopher <Christopher.Martin@nexteraenergy.com>
Subject: [EXT] Farmington & Quinebaug Generator Asset IDs

*** EXTERNAL email. Please be cautious and evaluate before you click on links, open attachments, or provide credentials. ***

Hi Kristen,

Thank you for setting up yesterday's call and for providing us with the Generator Asset IDs for both projects:

- **Farmington** (LGIA-ISONE/CMP-20-01, effective February 19, 2020) – **Generator Asset ID #s: 69786 / 69787** and
- **Quinebaug** (LGIA-ISONE/CLP-21-01, effective March 3, 2021) - **Generator Asset ID #: 69801**

The Rhode Island PUC is requiring that ISONE confirms our asset ID numbers either via email, letter or screenshot.

Another issue that has come to our attention is that our Farmington project has two (2) Generator Asset ID numbers (69786 / 69787) and we would like to get some clarity as to:

- Why there are two (2) numbers? and

APPENDIX C
(Revised 4/19/2021)
(Required of all Applicants with Generation Units at the Site of Existing
Renewable Energy Resources)

If the Generation Unit: (1) first entered into commercial operation on or before December 31, 1997; or (2) is located at the exact site of an Existing Renewable Energy Resource, please complete the following and attach documentation, as necessary to support all responses:

- C.1 Is the Generating Unit seeking certification, either in whole or in part, as a New Renewable Energy Resource?
 Yes
 No
- C.2 If you answered "Yes" to question C.1, please complete the remainder of Appendix C. If you answered "No" and are seeking certification entirely as an Existing Renewable Energy Resource, you do NOT need to complete the remainder of Appendix C.
- C.3 If an Existing Renewable Energy Resource is/was located at the site, has such Existing Renewable Energy Resource been retired and replaced with the new Generation Unit at the same site?
 Yes
 No
- C.4 Is the Generation Unit a Repowered Generation Unit (as defined in RES Rules Section 2.3(A)(29)) which uses Eligible Renewable Energy Resources and which first entered commercial operation after December 31, 1997 at the site of an existing Generation Unit?
 Yes
 No
- C.5 If you checked "Yes" to question C.4 above, please provide documentation to support that the entire output of the Repowered Generation Unit first entered commercial operation after December 31, 1997.
- C.6 Is the Generation Unit a multi-fuel facility in which an Eligible Biomass Fuel is first co-fired with fossil fuels after December 31, 1997?
 Yes
 No
- C.7 If you checked "Yes" to question C.6 above, please provide documentation to support that the renewable energy fraction of the energy output first occurred after December 31, 1997.

C.8 Is the Generation Unit an Existing Renewable Energy Resource other than an Intermittent Resource (as defined in RES Rules Sections 2.3(10) and 2.3(15))?

Yes

No

C.9 If you checked "Yes" to question C.8 above, please attach evidence of completed capital investments after December 31, 1997 attributable to efficiency improvements or additions of capacity that are sufficient to, were intended to, and can be demonstrated to increase annual electricity output in excess of ten percent (10%). As specified in RES Rules Section 2.3(23)(e), the determination of incremental production shall not be based on any operational changes at such facility **not directly** associated with the efficiency improvements or additions of capacity.

Please provide the single proposed percentage of production to be deemed incremental, attributable to the efficiency improvements or additions of capacity placed in service after December 31, 1997. Please make this calculation by comparing actual electrical output over the three calendar years 1995-1997 (the "Historical Generation Baseline") with the actual output following the improvements. The incremental production above the Historical Generation Baseline will be considered "New" generation for the purposes of RES. Please give the percentage of the facility's total output that qualifies as such to be considered "New" generation.

C.10 Is the Generating Unit an Existing Renewable Energy Resource that is an Intermittent Resource?

Yes

No

C.11 If you checked "Yes" to question C.10 above, please attach evidence of completed capital investments after December 31, 1997 attributable to efficiency improvements or additions of capacity that are sufficient to, were intended to, and have demonstrated on a normalized basis to increase annual electricity output in excess of ten percent (10%). The determination of incremental production shall not be based on any operational changes at such facility **not directly** associated with the efficiency improvements or additions of capacity. In no event shall any production that would have existed during the Historical Generation Baseline period in the absence of the efficiency improvements or additions to capacity be considered incremental production. Please refer to RES Rules Section 2.3(23)(f) for further guidance.

- C.12 If you checked “Yes” to C.10, provide the single proposed percentage of production to be deemed incremental, attributable to the efficiency improvements or additions of capacity placed in service after December 31, 1997. The incremental production above the Historical Generation Baseline will be considered “New” generation for the purposes of RES. Please make this calculation by comparing actual monthly electrical output over the three calendar years 1995-1997 (the “Historical Generation Baseline”) with the actual output following the improvements on a normalized basis. Please provide back-up information sufficient for the Commission to make a determination of this incremental production percentage.

For example, for small hydro facilities, please use historical river flow data to create a monthly normalized comparison (e.g. average MWh produced per cubic foot/second of river flow for each month) between actual output values post-improvements with the Historical Generation Baseline. For solar and wind facilities, please use historical solar irradiation, wind flow, or other applicable data to normalize the facility’s current production against the Historical Generation Baseline.

- C.13 If you checked “No” to both C.3 and C.4 above, please complete the following:
- a. Was the Existing Renewable Energy Resource located at the exact site at any time during calendar years 1995 through 1997?
 Yes
 No
 - b. If you checked “Yes” in Subsection (a) above, please provide the Generation Unit Asset Identification Number and the average annual electrical production (MWhs) for the three calendar years 1995 through 1997, or for the first 36 months after the Commercial Operation Date if that date is after December 31, 1994, for each such Generation Unit.
 - c. Please attach a copy of the derivation of the average provided in (b) above, along with documentation support (such as ISO reports) for the information provided in Subsection (b) above. Data must be consistent with quantities used for ISO Market Settlement System.

GIS Certification #:

APPENDIX D
(Revised 4/19/2021)
(Required of Applicants Seeking Eligibility for Customer-Sited and/or Off-Grid
Generation Facilities, Rhode Island-Located Remote Net Metered Facilities, and
Associated Aggregations)

Customer-sited, remote net metered, and off-grid Generation Facilities (see Section IV) physically located in Rhode Island may be certified as an Eligible Renewable Energy Resource if their NEPOOL GIS Certificates are created from the verified electrical generation of a single Rhode Island-sited Generation Unit, or by way of a Commission-certified aggregation of Generation Units located in Rhode Island that use the same generation technology. Please complete the following and attach documentation, as necessary to support all responses:

D.1 For eligible aggregations, please identify the location(s) in Rhode Island of each Generation Unit in the aggregation (provide attachments if extra space is needed), or if the application is for a single Rhode Island-sited Generation Unit, please provide the name and location of the single Generation Unit site.

D.2 Please propose procedures under which the aggregate Generation Unit(s) will operate ("Aggregation Agreement"). In accordance with RES Rules Section 2.6(H)(4), the proposed Aggregation Agreement shall contain the following information:

(a) Name and contact information of the Aggregator (or single site) 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;

Name and title: _____

Company: _____

Address

Phone: _____

Email: _____

- (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;

Name and title: _____

Company: _____

Address

Phone: _____

Email: _____

Qualifications: _____

- (c) A declaration of any and all business or financial relations between Aggregator (or single site) Owner and Verifier, which the Commission will use to evaluate the independence of the Verifier.¹

- (d) Please identify the type of technology that will be included in the aggregation (or single-site generation unit), and a 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);

¹ 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.

- (e) Please describe the proposed operating procedures for the aggregation (or single-site generation unit), 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;²

- (f) Please describe 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;

- (g) Please confirm and describe 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.³

² 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 rules 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 iv) include a procedure for the Verifier to report to the Commission on the results of their verification process.

³ 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.

D.3 Applicant must acknowledge that:

- (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 (behind-the-meter) or Off-grid Generation Facility, as defined in RES Rules Sections 2.3(5) and 2.3(26), respectively, or a Customer-sited (grid connected) or Remote Net Metered (grid connected) Generation Facility, 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)

APPENDIX E
(Revised 4/19/2021)

(Required of all Applicants Located in a Control Area Adjacent to NEPOOL)

Please complete the following and attach documentation, as necessary to support all responses:

- E.1 Please indicate in which Control Area adjacent to NEPOOL the Generation Unit is located:
- New York
 - Hydro Quebec
 - Maritimes (including Northern Maine Independent System Administrator)

- E.2 Applicant must provide to the Commission by July 1st of each year assurances that the Generation Unit's New Renewable Energy Resources used for compliance with the Rhode Island's Renewable Energy Act during the previous Compliance Year 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. Such assurances may consist of a report from a neighboring Generation Attribute accounting system or an affidavit from the Generation Unit.

- ← please check this box to acknowledge this requirement
- N/A or other (please explain)

- E.3 Applicant must acknowledge and provide evidence to support that, in accordance with RES Rules Section 2.5(B), the Generation Attributes associated with the Generation Unit shall be applied to the Rhode Island Renewable Energy Standard only to the extent of the energy produced by the Generation Unit that is or will be actually delivered into NEPOOL for consumption by New England customers. Verification of the delivery of such energy from the Generation Unit into NEPOOL will be performed in accordance with subparagraphs 1 and 2 of RES Rules Section 2.5(B).

- ← please check this box to acknowledge this requirement.
- N/A or other (please explain)

(a) Under RES Rules 2.5.1(B)(1), Applicant must verify that the energy produced by the Generation Unit is actually delivered into NEPOOL via “a unit-specific bilateral contract for the sale and delivery of such energy into NEPOOL”.

← please check this box to acknowledge the requirement for Applicant to provide ongoing evidence of one or more unit-specific bilateral contract(s) for all energy delivery into NEPOOL for which Applicant seeks RI RES certification, prior to creation of certificates in each quarter, and:

i. Please describe the type of evidence to be provided to the GIS Administrator to demonstrate the existence of such unit-specific bilateral contract(s) for the sale and delivery of such energy into NEPOOL, including duration, quantity and counter-party in NEPOOL:

(attach more detail if the space provided is not sufficient)

APPENDIX F
(Revised 4/19/2021)
Eligible Biomass Fuel Source Plan
**(Required of all Applicants Proposing to Use An Eligible, including Unlisted,
Biomass Fuel)**

Note to Applicants: Please refer to the RES Certification Filing Methodology Guide posted on the Commission's web site (www.ripuc.ri.gov/utilityinfo/res.html) for information, templates and suggestions regarding the types and levels of detail appropriate for responses to specific application items requested below. Also, please see RES Rules Section 2.7(A) for additional details on specific requirements.

The phrase "Eligible Biomass Fuel" (per RES Rules Section 2.3(7)) means fuel sources including brush, stumps, lumber ends and trimmings, wood pallets, bark, wood chips, shavings, slash, yard trimmings, site clearing waste, wood packaging, and other clean wood that is not mixed with other unsorted solid wastes;¹ agricultural waste, food and vegetative material; energy crops; landfill methane² or biogas,³ provided that such gas is collected and conveyed directly to the Generation Unit without use of facilities used as common carriers of natural gas; or neat bio-diesel and other neat liquid fuels that are derived from such fuel sources.

In determining if an Eligible Biomass Generation Unit shall be certified, the Commission will consider if the fuel source plan can reasonably be expected to ensure that only Eligible Biomass Fuels will be used, and in the case of co-firing ensure that only that proportion of generation attributable to an Eligible Biomass Fuel be eligible. Certification will not be granted to those Generation Units with fuel source plans the Commission deems inadequate for these purposes.

This Appendix must be attached to the front of Applicant's Fuel Source Plan required for Generating Units proposing to use an Eligible Biomass Fuel (per RES Rules Section 2.7(A)).

¹ Generation Units using wood sources other than those listed above may make application, as part of the required fuel source plan described in RES Rules Section 2.7(A), for the Commission to approve a particular wood source as "clean wood." The burden will be on the applicant to demonstrate that the wood source is at least as clean as those listed in the legislation. Wood sources containing resins, glues, laminates, paints, preservatives, or other treatments that would combust or off-gas, or mixed with any other material that would burn, melt, or create other residue aside from wood ash, will not be approved as clean wood.

² Landfill gas, which is an Eligible Biomass Fuel, means only that gas recovered from inside a landfill and resulting from the natural decomposition of waste, and that would otherwise be vented or flared as part of the landfill's normal operation if not used as a fuel source.

³ Gas resulting from the anaerobic digestion of sewage or manure is considered to be a type of biogas, and therefore an Eligible Biomass Fuel that has been fully separated from the waste stream.

F.1 The attached Fuel Source Plan includes a detailed description of the type of Eligible Biomass Fuel to be used at the Generation Unit.

Detailed description attached?

Yes

No

N/A

Comments:

F.2 If the proposed fuel is "other clean wood," the Fuel Source Plan should include any further substantiation to demonstrate why the fuel source should be considered as clean as those clean wood sources listed in the legislation.

Further substantiation attached?

Yes

No

N/A

Comments:

F.3 In the case of co-firing with ineligible fuels, the Fuel Source Plan must include a description of (a) how such co-firing will occur; (b) how the relative amounts of Eligible Biomass Fuel and ineligible fuel will be measured; and (c) how the eligible portion of generation output will be calculated. Such calculations shall be based on the energy content of all of the proposed fuels used.

Description attached?

Yes

No

N/A

Comments:

- F.4 The Fuel Source Plan must provide a description of what measures will be taken to ensure that only the Eligible Biomass Fuel are used, examples of which may include: standard operating protocols or procedures that will be implemented at the Generation Unit, contracts with fuel suppliers, testing or sampling regimes.

Description provided?

Yes

No

N/A

Comments:

- F.5 Please include in the Fuel Source Plan an acknowledgement that the fuels stored at or brought to the Generation Unit will only be either Eligible Biomass Fuels or fossil fuels used for co-firing and that Biomass Fuels not deemed eligible will not be allowed at the premises of the certified Generation Unit. And please check the following box to certify that this statement is true.

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

N/A or other (please explain)

- F.6 If the proposed fuel includes recycled wood waste, please submit documentation that such fuel meets the definition of Eligible Biomass Fuel and also meets material separation, storage, or handling standards acceptable to the Commission and furthermore consistent with the RES Rules.

Documentation attached?

Yes

No

N/A

Comments:

F.7 Please certify that you will file all reports and other information necessary to enable the Commission to verify the on-going eligibility of the renewable energy generators pursuant to RES Rules Section 2.6(C). Specifically, RES Rules Section 2.6(C)(1) states that Renewable Energy Resources of the type that combust fuel to generate electricity must file quarterly reports due 60 days after the end of each quarter on the fuel stream used during the quarter. Instructions and filing documents for the quarterly reports can be found on the Commissions website or can be furnished upon request.

- ← check this box to certify that the above statement is true
- N/A or other (please explain)

F.8 Please attach a copy of the Generation Unit's Valid Air Permit or equivalent authorization.

Valid Air Permit or equivalent attached?

- Yes
- No
- N/A

Comments:

F.9 Effective date of Valid Air Permit or equivalent authorization:

____ / ____ / _____

F.10 State or jurisdiction issuing Valid Air Permit or equivalent authorization:
