

September 18, 2018

**BY HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 4774 – Renewable Energy Growth Program  
Tariff Advice Filing for Renewable Energy Growth Program Solicitation  
and Enrollment Process Rules  
2018 Second Open Enrollment Report**

Dear Ms. Massaro:

I have enclosed ten (10) copies of National Grid's Second 2018 Rhode Island Renewable Energy (RE) Growth Program Open Enrollment Report (Attachment 1), which includes a list of eight projects the Company has selected for Certificates of Eligibility (COE) pursuant to R.I. Gen. Laws § 39-26.6-20(a), (b).

Pursuant to R.I. Gen. Laws § 39-26.6-20(b), Attachment 1 includes a list of medium-scale solar, commercial-scale solar, community remote distributed generation commercial solar, and community remote distributed generation large solar projects. The COEs are included in Attachment 2. The Company will file the Tariff Supplement with populated information for projects that have been awarded COEs once the PUC approves the COEs.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4774 Service List  
Leo Wold, Esq.  
John Bell, Division

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



\_\_\_\_\_  
Joanne M. Scanlon

September 18, 2018  
Date

**Docket No. 4774 – Renewable Energy Growth Program for Year 2018  
RI Distributed Generation Board and National Grid**

Service List updated 2/21/18

<b>Parties' Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
Raquel Webster, Esq. Celia O'Brien, Esq. <b>National Grid</b> 280 Melrose Street Providence, RI 02907	<a href="mailto:Raquel.webster@nationalgrid.com">Raquel.webster@nationalgrid.com</a> ;	781-907-2121
	<a href="mailto:Jennifer.hutchinson@nationalgrid.com">Jennifer.hutchinson@nationalgrid.com</a> ;	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
	<a href="mailto:Ian.springsteel@nationalgrid.com">Ian.springsteel@nationalgrid.com</a> ;	
	<a href="mailto:Omar.Muneeruddin2@nationalgrid.com">Omar.Muneeruddin2@nationalgrid.com</a> ;	
Andrew Marcaccio, Esq. <b>Dept. of Administration</b> Division of Legal Services One Capitol Hill, 4 <sup>th</sup> Floor Providence, RI 02908	<a href="mailto:Andrew.Marcaccio@doa.ri.gov">Andrew.Marcaccio@doa.ri.gov</a> ;	401-222-8880
	<a href="mailto:Carol.Grant@energy.ri.gov">Carol.Grant@energy.ri.gov</a> ;	
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov</a> ;	
Jon Hagopian, Sr. Counsel <b>Division of Public Utilities and Carriers</b>	<a href="mailto:Jon.hagopian@dpuc.ri.gov">Jon.hagopian@dpuc.ri.gov</a> ;	401-784-4775
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Macky.McCleary@dpuc.ri.gov">Macky.McCleary@dpuc.ri.gov</a> ;	
	<a href="mailto:Jonathan.Schrag@dpuc.ri.gov">Jonathan.Schrag@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.contente@dpuc.ri.gov">Al.contente@dpuc.ri.gov</a> ;	
	<a href="mailto:Jmunoz@riag.ri.gov">Jmunoz@riag.ri.gov</a> ;	
Richard Hahn Carrie Gilbert Daymark Energy Advisors 1 Washington Mall, 9th floor Boston, MA 02108	<a href="mailto:rhahn@daymarkea.com">rhahn@daymarkea.com</a> ;	
	<a href="mailto:cgilbert@daymarkea.com">cgilbert@daymarkea.com</a> ;	
<b>Sunrun, Inc.</b> Seth H. Handy, Esq. Handy Law, LLC	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	401-626-4839

Gracie Walovich Sunrun Inc.	<a href="mailto:gracie.walovich@sunrun.com">gracie.walovich@sunrun.com</a> ;	
Beren Argetsinger Keyes & Fox LLP	<a href="mailto:bargetsinger@kfwlaw.com">bargetsinger@kfwlaw.com</a> ;	
File an original & 9 copies w/ Luly E. Massaro, Commission Clerk <b>Public Utilities Commission</b> 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ; <a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ; <a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ; <a href="mailto:Linda.george@puc.ri.gov">Linda.george@puc.ri.gov</a> ;	401-780-2107
Gracie Walovich, Sunrun, Inc.	<a href="mailto:gracie.walovich@sunrun.com">gracie.walovich@sunrun.com</a> ;	
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Mark Depasquale, Wind Energy Development	<a href="mailto:md@wedenergy.com">md@wedenergy.com</a> ;	
Jerry Elmer, Esq., CLF	<a href="mailto:jelmer@clf.org">jelmer@clf.org</a> ;	401-351-1102
Charlie Grant, Essex Capital Partners	<a href="mailto:cgrant@essexcapitalpartners.com">cgrant@essexcapitalpartners.com</a> ;	

## Second 2018 Rhode Island Renewable Energy Growth Program Open Enrollment Report

National Grid selected eight projects for certificates of eligibility in the Second 2018 Open Enrollment, totaling 5,171 kW of project nameplate capacity.

### Distribution Company-Awarded Certificates

Pursuant to the provisions of the Rhode Island Renewable Energy Growth Program, R.I. Gen Laws § 39-26.6-20(b), National Grid is providing the attached list of medium-scale solar projects that have been awarded certificates of eligibility in the Second Open Enrollment that occurred in July 2018.

<b>Project &amp; Location</b>	<b>Nameplate Capacity (kW)</b>	<b>Class</b>	<b>Price (¢/kWh)</b>	<b>Ceiling Price (¢/kWh)</b>	<b>Tariff Term</b>
Oxford Place Solar 200 Gordon Ave. Providence, RI 02905	54	Medium-Scale Solar (26-250 kW DC)	19.75	24.95	20
TES Scituate Solar 37 Thurber Blvd Smithfield, RI 02917	123	Medium-Scale Solar (26-250 kW DC)	22.24	24.95	20
85 Commercial Way Solar 85 Commercial Way East Providence, RI 02914	192	Medium-Scale Solar (26-250 kW DC)	22.75	24.95	20
9 Peter Road 9 Peter Road Bristol, RI 02809	42	Medium-Scale Solar (26-250 kW DC)	23.00	24.95	20
<b>Total</b>	<b>411</b>				

## Rhode Island Public Utilities Commission (PUC)-Awarded Certificates

Pursuant to the provisions of the Rhode Island Renewable Energy Growth Program, R.I. Gen. Laws § 39-26.6-20(b), National Grid is submitting the attached list of Commercial-Scale Solar, CRDG Commercial Solar and CRDG Large Solar projects selected by National Grid with their corresponding pricing information and is requesting PUC approval for this list of projects.

### Second 2018 Open Enrollment Results

<b>Project &amp; Location</b>	<b>Nameplate Capacity (kW)</b>	<b>Class</b>	<b>Price (¢/kWh)</b>	<b>Ceiling Price (¢/kWh)</b>	<b>Tariff Term</b>
85 Fairmount LLC 85 Fairmount Street Woonsocket, RI 02895	999	Commercial-Scale Solar (251-999 kW DC)	17.50	19.65	20
Grand Ave Solar 95 Grand Avenue Pawtucket, RI 02861	964	Commercial-Scale Solar (251-999 kW DC)	19.35	19.65	20
Palmer Circle Two Solar 41 Palmer Circle Hopkinton, RI 02832	997	CRDG Commercial Solar (251-999 kW DC)	22.40	22.45	20
South Road Solar 563 South Road East Greenwich, RI 02818	1,800	CRDG Large Solar (1,000-5,000 kW DC)	18.90	18.92	20
<b>Total</b>	<b>4,760</b>				

## Certificate of Eligibility

### Rhode Island Renewable Energy Growth Program

### The Narragansett Electric Company d/b/a National Grid

This Certificate of Eligibility is written confirmation that the Distributed Generation (“DG”) Project referenced below has been selected for participation in the Rhode Island Renewable Energy Growth Program. The Project Applicant is bound by the terms and conditions of the Tariff for the Renewable Energy Growth Program (the “Non-Residential Tariff”) as well as Other Company Tariff Requirements described and referenced therein. In addition, the facility is interconnected with the distribution system of the Narragansett Electric Company and is located in the Narragansett Electric Company ISO-NE load zone.

**Project Name:** 85 Fairmount LLC

**Project Owner/  
Project Contact:** Eighty Five Fairmount LLC  
Charles Kovacic

**Facility Address:** 85 Fairmount Street  
Woonsocket, RI 02895

**Phone Number:** (508) 259-5726

**Email Address:** charles.kovacic@directenergysolar.com

**RI Interconnection Application ID or Ref#:** RI-23390866

**Renewable Technology:** Solar PV - ground mount  
*Solar PV – rooftop; Solar PV – ground mount; Wind; Anaerobic Digestion; Hydropower*

**Renewable Energy Class:** Commercial-Scale Solar  
*Commercial Scale Solar; Large Scale Solar; Small Wind; Large Wind; Small DG Project; Large DG Project; CRDG Commercial Solar; CRDG Large Solar*

**Nameplate Capacity (kW):** 999  
*Maximum rated output or gross output of a generator; For Solar, the total rated output of all panels measured in DC.*

**Maximum Hourly Output (kWh AC per hour):** 800  
*Maximum amount of energy produced in an hour measured in AC for all technologies*

**Expected Annual Energy Output (MWh per year):** 1,315  
*Expected amount of energy produced in a year measured in AC for all technologies*

**Applicable Renewable Energy Growth Program Tariff: Non-Residential Tariff**

*Indicate which tariff the Project Applicant is bound by the terms and conditions of: Renewable Energy Growth Program Tariff for Residential Customers, RIPUC No. 2151-E or Renewable Energy Growth Program Tariff for Non-Residential Customers, RIPUC No. 2152-E.*

**Required Performance Guarantee Deposit Paid (\$): \$32,875**

**Additional Required Performance Guarantee Deposit Paid (\$): \$0**

*Subject to the conditions set forth in Section 3.f of the Tariff, an Applicant may elect to extend the DG Project deadline a second time for providing the Output Certification by posting an additional Deposit amount equal to one-half of the original Deposit amount.*

**Performance Based Incentive (cents/kWh): 17.50**

**Term of Performance Based Incentive (# years): 20**

*The term of the applicable Tariff supplement beginning on the Certificate Effective Date.*

**Certificate Issuance Date: TBD - pending PUC approval**

**Payment Option: Option 1**

*Subject to the conditions set forth in Section 8.c of the Tariff, an Applicant must notify the Company of the manner by which it will be compensated for its output under the Program. Option 1 – Direct payment of the entire PBI or Option 2 – a combination of direct payment and customer bill credit.*

**Output Certification Deadline: Certificate Issuance Date + 2 years**

*If the Output Certification is not received within the required timeframe, subject to the conditions set forth in Section 3 of the Tariff, the project's Certificate of Eligibility will be voided and its performance guarantee deposit will be forfeited. Once a DG Project has provided the Output Certification, the Project then has 90 days to meet all other requirements pursuant to Section 8.a. of the Tariff in order to receive payment.*

**Certificate Effective Date: [Click here to enter a date.](#)**

*The performance-based incentive is paid beginning on this date for the applicable term of the tariff. As a condition of receiving payments, the Applicant must provide confirmation of: 1) the Company's written authority to interconnect to its electric distribution system and Applicant's payment of all amounts due; 2) Commission certification of the DG Project as an Eligible Renewable Energy Resource; 3) registration of the DG Project with the ISO-NE and NEPOOL GIS; 4) the Output Certification; and 5) being current with amounts due on the electric service accounts or fulfilling the requirements of an approved payment plan.*

**Certificate Termination Date: [Click here to enter a date.](#)**

*The performance-based incentive is paid up to this date covering the applicable 20-year term of the tariff. Section 11 of the Tariff highlights termination provisions under which the tariff might be terminated earlier than the stated Certificate Termination Date.*

## Certificate of Eligibility

### Rhode Island Renewable Energy Growth Program

### The Narragansett Electric Company d/b/a National Grid

This Certificate of Eligibility is written confirmation that the Distributed Generation (“DG”) Project referenced below has been selected for participation in the Rhode Island Renewable Energy Growth Program. The Project Applicant is bound by the terms and conditions of the Tariff for the Renewable Energy Growth Program (the “Non-Residential Tariff”) as well as Other Company Tariff Requirements described and referenced therein. In addition, the facility is interconnected with the distribution system of the Narragansett Electric Company and is located in the Narragansett Electric Company ISO-NE load zone.

**Project Name:** Grand Ave Solar

**Project Owner/  
Project Contact:** Sound Solar Systems LLC  
Stepan Dragan Tony Savino

**Facility Address:** 95 Grand Avenue  
Pawtucket, RI 02861

**Phone Number:** (203) 698-0050

**Email Address:** stepan.dragan@soundsolar.com tobias.vandenberg@soundsolar.com

**RI Interconnection Application ID or Ref#:** RI-25851082

**Renewable Technology:** Solar PV - rooftop  
*Solar PV – rooftop; Solar PV – ground mount; Wind; Anaerobic Digestion; Hydropower*

**Renewable Energy Class:** Commercial-Scale Solar  
*Commercial Scale Solar; Large Scale Solar; Small Wind; Large Wind; Small DG Project; Large DG Project; CRDG Commercial Solar; CRDG Large Solar*

**Nameplate Capacity (kW):** 964  
*Maximum rated output or gross output of a generator; For Solar, the total rated output of all panels measured in DC.*

**Maximum Hourly Output (kWh AC per hour):** 499  
*Maximum amount of energy produced in an hour measured in AC for all technologies*

**Expected Annual Energy Output (MWh per year):** 1,100  
*Expected amount of energy produced in a year measured in AC for all technologies*



**Applicable Renewable Energy Growth Program Tariff: Non-Residential Tariff**

*Indicate which tariff the Project Applicant is bound by the terms and conditions of: Renewable Energy Growth Program Tariff for Residential Customers, RIPUC No. 2151-E or Renewable Energy Growth Program Tariff for Non-Residential Customers, RIPUC No. 2152-E.*

**Required Performance Guarantee Deposit Paid (\$): \$27,500**

**Additional Required Performance Guarantee Deposit Paid (\$): \$0**

*Subject to the conditions set forth in Section 3.f of the Tariff, an Applicant may elect to extend the DG Project deadline a second time for providing the Output Certification by posting an additional Deposit amount equal to one-half of the original Deposit amount.*

**Performance Based Incentive (cents/kWh): 19.35**

**Term of Performance Based Incentive (# years): 20**

*The term of the applicable Tariff supplement beginning on the Certificate Effective Date.*

**Certificate Issuance Date: TBD - pending PUC approval**

**Payment Option: Option 1**

*Subject to the conditions set forth in Section 8.c of the Tariff, an Applicant must notify the Company of the manner by which it will be compensated for its output under the Program. Option 1 – Direct payment of the entire PBI or Option 2 – a combination of direct payment and customer bill credit.*

**Output Certification Deadline: Certificate Issuance Date + 2 years**

*If the Output Certification is not received within the required timeframe, subject to the conditions set forth in Section 3 of the Tariff, the project's Certificate of Eligibility will be voided and its performance guarantee deposit will be forfeited. Once a DG Project has provided the Output Certification, the Project then has 90 days to meet all other requirements pursuant to Section 8.a. of the Tariff in order to receive payment.*

**Certificate Effective Date: [Click here to enter a date.](#)**

*The performance-based incentive is paid beginning on this date for the applicable term of the tariff. As a condition of receiving payments, the Applicant must provide confirmation of: 1) the Company's written authority to interconnect to its electric distribution system and Applicant's payment of all amounts due; 2) Commission certification of the DG Project as an Eligible Renewable Energy Resource; 3) registration of the DG Project with the ISO-NE and NEPOOL GIS; 4) the Output Certification; and 5) being current with amounts due on the electric service accounts or fulfilling the requirements of an approved payment plan.*

**Certificate Termination Date: [Click here to enter a date.](#)**

*The performance-based incentive is paid up to this date covering the applicable 20-year term of the tariff. Section 11 of the Tariff highlights termination provisions under which the tariff might be terminated earlier than the stated Certificate Termination Date.*

## Certificate of Eligibility

### Rhode Island Renewable Energy Growth Program

### The Narragansett Electric Company d/b/a National Grid

This Certificate of Eligibility is written confirmation that the Distributed Generation (“DG”) Project referenced below has been selected for participation in the Rhode Island Renewable Energy Growth Program. The Project Applicant is bound by the terms and conditions of the Tariff for the Renewable Energy Growth Program (the “Non-Residential Tariff”) as well as Other Company Tariff Requirements described and referenced therein. In addition, the facility is interconnected with the distribution system of the Narragansett Electric Company and is located in the Narragansett Electric Company ISO-NE load zone.

**Project Name:** Palmer Circle Two Solar

**Project Owner/  
Project Contact:** Oak Square Development LLC  
John Typadis

**Facility Address:** 41 Palmer Circle  
Hopkinton, RI 02832

**Phone Number:** (617) 409-7379

**Email Address:** john@oaksquarepartners.com

**RI Interconnection Application ID or Ref#:** RI-25812940

**Renewable Technology:** Solar PV - ground mount  
*Solar PV – rooftop; Solar PV – ground mount; Wind; Anaerobic Digestion; Hydropower*

**Renewable Energy Class:** CRDG Commercial Solar  
*Commercial Scale Solar; Large Scale Solar; Small Wind; Large Wind; Small DG Project; Large DG Project; CRDG Commercial Solar; CRDG Large Solar*

**Nameplate Capacity (kW):** 997  
*Maximum rated output or gross output of a generator; For Solar, the total rated output of all panels measured in DC.*

**Maximum Hourly Output (kWh AC per hour):** 816  
*Maximum amount of energy produced in an hour measured in AC for all technologies*

**Expected Annual Energy Output (MWh per year):** 1,269  
*Expected amount of energy produced in a year measured in AC for all technologies*

**Applicable Renewable Energy Growth Program Tariff: Non-Residential Tariff**

*Indicate which tariff the Project Applicant is bound by the terms and conditions of: Renewable Energy Growth Program Tariff for Residential Customers, RIPUC No. 2151-E or Renewable Energy Growth Program Tariff for Non-Residential Customers, RIPUC No. 2152-E.*

**Required Performance Guarantee Deposit Paid (\$): \$31,725**

**Additional Required Performance Guarantee Deposit Paid (\$): \$0**

*Subject to the conditions set forth in Section 3.f of the Tariff, an Applicant may elect to extend the DG Project deadline a second time for providing the Output Certification by posting an additional Deposit amount equal to one-half of the original Deposit amount.*

**Performance Based Incentive (cents/kWh): 22.40**

**Term of Performance Based Incentive (# years): 20**

*The term of the applicable Tariff supplement beginning on the Certificate Effective Date.*

**Certificate Issuance Date: TBD - pending PUC approval**

**Payment Option: Option 1**

*Subject to the conditions set forth in Section 8.c of the Tariff, an Applicant must notify the Company of the manner by which it will be compensated for its output under the Program. Option 1 – Direct payment of the entire PBI or Option 2 – a combination of direct payment and customer bill credit.*

**Output Certification Deadline: Certificate Issuance Date + 2 years**

*If the Output Certification is not received within the required timeframe, subject to the conditions set forth in Section 3 of the Tariff, the project's Certificate of Eligibility will be voided and its performance guarantee deposit will be forfeited. Once a DG Project has provided the Output Certification, the Project then has 90 days to meet all other requirements pursuant to Section 8.a. of the Tariff in order to receive payment.*

**Certificate Effective Date: [Click here to enter a date.](#)**

*The performance-based incentive is paid beginning on this date for the applicable term of the tariff. As a condition of receiving payments, the Applicant must provide confirmation of: 1) the Company's written authority to interconnect to its electric distribution system and Applicant's payment of all amounts due; 2) Commission certification of the DG Project as an Eligible Renewable Energy Resource; 3) registration of the DG Project with the ISO-NE and NEPOOL GIS; 4) the Output Certification; and 5) being current with amounts due on the electric service accounts or fulfilling the requirements of an approved payment plan.*

**Certificate Termination Date: [Click here to enter a date.](#)**

*The performance-based incentive is paid up to this date covering the applicable 20-year term of the tariff. Section 11 of the Tariff highlights termination provisions under which the tariff might be terminated earlier than the stated Certificate Termination Date.*

## Certificate of Eligibility

### Rhode Island Renewable Energy Growth Program

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**Project Name:** South Road Solar

**Project Owner/  
Project Contact:** Oak Square Development LLC  
John Typadis

**Facility Address:** 563 South Road  
East Greenwich, RI 02818

**Phone Number:** (617) 409-7379

**Email Address:** john@oaksquarepartners.com

**RI Interconnection Application ID or Ref#:** RI-25468811

**Renewable Technology:** Solar PV - ground mount  
*Solar PV – rooftop; Solar PV – ground mount; Wind; Anaerobic Digestion; Hydropower*

**Renewable Energy Class:** CRDG Large Solar  
*Commercial Scale Solar; Large Scale Solar; Small Wind; Large Wind; Small DG Project; Large DG Project; CRDG Commercial Solar; CRDG Large Solar*

**Nameplate Capacity (kW):** 1,800  
*Maximum rated output or gross output of a generator; For Solar, the total rated output of all panels measured in DC.*

**Maximum Hourly Output (kWh AC per hour):** 1,560  
*Maximum amount of energy produced in an hour measured in AC for all technologies*

**Expected Annual Energy Output (MWh per year):** 2,284  
*Expected amount of energy produced in a year measured in AC for all technologies*

**Applicable Renewable Energy Growth Program Tariff: Non-Residential Tariff**

*Indicate which tariff the Project Applicant is bound by the terms and conditions of: Renewable Energy Growth Program Tariff for Residential Customers, RIPUC No. 2151-E or Renewable Energy Growth Program Tariff for Non-Residential Customers, RIPUC No. 2152-E.*

**Required Performance Guarantee Deposit Paid (\$): \$57,100**

**Additional Required Performance Guarantee Deposit Paid (\$): \$0**

*Subject to the conditions set forth in Section 3.f of the Tariff, an Applicant may elect to extend the DG Project deadline a second time for providing the Output Certification by posting an additional Deposit amount equal to one-half of the original Deposit amount.*

**Performance Based Incentive (cents/kWh): 18.90**

**Term of Performance Based Incentive (# years): 20**

*The term of the applicable Tariff supplement beginning on the Certificate Effective Date.*

**Certificate Issuance Date: TBD - pending PUC approval**

**Payment Option: Option 1**

*Subject to the conditions set forth in Section 8.c of the Tariff, an Applicant must notify the Company of the manner by which it will be compensated for its output under the Program. Option 1 – Direct payment of the entire PBI or Option 2 – a combination of direct payment and customer bill credit.*

**Output Certification Deadline: Certificate Issuance Date + 2 years**

*If the Output Certification is not received within the required timeframe, subject to the conditions set forth in Section 3 of the Tariff, the project's Certificate of Eligibility will be voided and its performance guarantee deposit will be forfeited. Once a DG Project has provided the Output Certification, the Project then has 90 days to meet all other requirements pursuant to Section 8.a. of the Tariff in order to receive payment.*

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**Certificate Termination Date: [Click here to enter a date.](#)**

*The performance-based incentive is paid up to this date covering the applicable 20-year term of the tariff. Section 11 of the Tariff highlights termination provisions under which the tariff might be terminated earlier than the stated Certificate Termination Date.*