

**Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Department of Energy Resources**

**Alternative Energy Portfolio Standard (APS)
Request for Approval of an Independent Verifier**

*for Generation Units Whose Output is Not Monitored & Reported By ISO New England,
Including All CHP, Flywheel Storage, and Renewable Thermal Generation Units,
per 225 CMR 16.05(1)(c)*

The required information must be entered by the Owner or Operator of the Generation Unit (or the Authorized Agent of the Aggregation) and is regarded as part of the Unit's Statement of Qualification Application (SQA).

Use the spaces provided below to enter all required information about the Generation Unit or Aggregation and the proposed Independent Verifier. After item 2.a below, the remaining information for Section 2 may be provided and/or expanded in an attached document, as necessary or appropriate, with references to such attachment(s) noted in the corresponding items below. Each attachment must include (a) the Generation Unit's name and SQA ID# & (b) the Independent Verifier's name, and (c) must identify the corresponding lettered item of this Request form.

The Independent Verifier must establish a "Third Party Meter Reader" account at the NEPOOL GIS (www.nepoolgis.com), for which a DOER notice of approval to the GIS is required, and must comply with the GIS Operating Rules (primarily Rule 2.5) as they apply to Third Party Meter Readers (defined in Rule 2.5(j)).

DOER expects the Generation Unit's Owner or Operator or the Aggregation's Authorized Agent to understand and assume responsibility for the provisions in Section 3 of this Request form.

1. Generation Unit (or Aggregation)

Generation Unit Name: _____

Location (municipality & state): _____

APS SQA ID#: _____

NEPOOL GIS Asset ID (*if not yet known, enter TBD*): NON _____

Contact person's name: _____

Contact person's email address & phone #: _____

2. Independent Verifier (a.k.a., Independent Third Party Meter Reader)

a. Name and contact information.

Organization: _____

Address: _____

Email address & phone #: _____

Web address (if any): _____

Contact Person's Name: _____

Title: _____

Email address & phone #: _____

- b. Qualifications.** Include any information the Applicant believes will assist the DOER in determining that the Independent Verifier will accurately and efficiently carry out its core responsibilities, as enumerated in Section 3 of this Request. The DOER may require additional evidence of qualifications.

- c. **Declaration of any and all business or financial relations between the Independent Verifier and the Unit Owner or Operator, as well as, if applicable, with the Aggregation Authorized Agent.** If the Authorized Representative of the Owner or Operator is not a member, officer, or employee of the Owner or Operator, then this declaration must also include the Independent Verifier's business or financial relations with the Authorized Representative. The DOER will use this information to evaluate the independence of the Independent Verifier¹.
- d. A statement that **(1)** indicates under what circumstances the Independent Verifier would not be considered sufficiently independent of an individual Generation Unit, and, but only in the case of an Aggregation, **(2)** states either that any Generation Unit not meeting this independence test would not be allowed to participate in the Aggregation or that a different Independent Verifier acceptable to the DOER would be engaged for such Unit.
- e. **Compensation Basis.** Provide a description of how the Independent Verifier will be compensated for its services by the Generation Unit Owner/Operator/Aggregator. DOER approval of the Independent Verifier will be denied or withdrawn if the Independent Verifier is compensated in a manner linked to the number of NEPOOL GIS Certificates created by the Generation Unit or the Aggregation.
- f. **Frequency of Reporting.** Provide a description of how frequently (but not less than annually) the Independent Verifier will directly enter into the NEPOOL GIS the quantity of energy produced in the applicable time period of the Generation Unit or Aggregation. The entry of generation data by the Independent Verifier must be through an interface designated for this purpose by the GIS and in accordance with GIS Operating Rules applicable to Independent Verifiers, and to which the GIS Generation Asset account holder shall not have access².
- g. **Methodology of Monitoring.** Provide a description of how the Independent Verifier will access and read the electrical energy output of the Generation Unit or Units. This must include the types of metering/monitoring equipment, communications medium, and software; however, detailed technical specifications are not requested here.

¹ **Reasons for ruling that an Independent 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.

² **Such generation data shall not include any generation data from previous time periods, except as provided as follows.** Output of a Generation Unit that is less than one full MWh may be applied to a subsequent quarter in accordance with NEPOOL GIS Operating Rules. Output of less than one MWh by any single Generation Unit within an Aggregation may be applied to the entire Aggregation's generation (if all Units of the Aggregation share a single GIS Asset ID), and any output of the Aggregation less than one full MWh may be applied to the subsequent quarter within a calendar year or to a subsequent calendar year, in accordance with GIS Operating Rules. The GIS does not record or create certificates for amounts less than one full MWh.

- h. Statement of Due Diligence.** Provide a statement attesting to the fact that the Independent Verifier has reviewed all of the sections of the APS regulations (225 CMR 16.00) and Guidelines that are relevant to the Generation Unit, and fully understands both the applicable APS formulae and how they are to be used to convert APS system meter readings into Alternative Energy Certificates (AECs).

3. Core Responsibilities of an Independent Verifier

DOER expects that the Independent Verifier will meet the following core responsibilities, and that the Generation Unit Owner or Operator or the Aggregation's Authorized Agent will enter an agreement with the Independent Verifier that will ensure that they are met.

- a. Be familiar with all rules and requirements for Generation Units in the Alternative Energy Portfolio Standard (APS) as identified in 225 CMR 16.00, all supporting guidelines, and any Statement of Qualification application documentation, with a particular focus on metering, reporting, and AEC calculation;
- b. Monitor directly (either electronically or on site) the fuel input meter(s) and the thermal and electrical output meter(s) of the Generation Unit on a regular basis (monthly or quarterly);
- c. Verify that the readings for each monitoring/reporting period do not exceed the technical capabilities of a Generation Unit of its type, capacity, and location, and the normal operating parameters of the particular Unit, and obtain and use corrected readings if appropriate;
- d. Inform the Generation Unit's Owner and/or Operator and/or its Authorized Representative if and when the output of the Unit or of any of its meters is higher or lower than the expected range, so that appropriate remedial action can be taken;
- e. Using the appropriate formula(s), calculate the MWh for AECs in accordance with the APS Regulation, Guidelines, and, if for a CHP Unit, any supplementary instructions from DOER's CHP Manager.
- f. Input the final calculated values into the Unit's NEPOOL GIS Asset ID accurately and on time, via the Verifier's own Third Party Meter Reader account at the GIS;
- g. If acting as the independent verifier for an APS qualified CHP system, report metered data and calculated values to DOER's CHP Manager in accordance with the CHP Manager's instructions; and
- h. Maintain well-organized, detailed records of all of the above, which are subject to DOER inspection.

The Owner or Operator of the Generation Unit or the Authorized Agent of the Aggregation may require additional duties, as they deem appropriate.