Comments of Allen Harari

Here are some thoughts about Aggregating Projects up to 5MW.

* Aggregation should be based on the installation of a new meter on a project that has not become operational; whether that meter is installed on a new project or the combination of an existing project in development with a new project.
* The entire generating array serving the new meter of an aggregated project must be located on contiguous parcel(s) of land.
* Increasing the size of an IX submission on adjacent parcels serviced by a single meter should be considered a modification to original CESIR for the site.
* A developer who has already paid for a CESIR for a project that has not yet interconnected and can be expanded and served by a single meter, should not be required to pay for an entirely new CESIR study but only an amendment to the developer's original CESIR study regardless of whether the developer has paid the 25% and/or 75% upgrade deposit.
* A developer will not lose his queue position if he decides to expand his project, per the above, but will be subject to an accelerated development schedule applied to the new portion of his project.
* \*\*\*PERMITTING must be a part of any project to maintain a position in the queue.
  + A developer in the permitting process with a smaller project meeting the aggregation criteria must demonstrate that the increased size of the project will meet the town's zoning code
  + A developer must demonstrate the projects' viability to be increased or aggregated to maintain the projects' position in the queue.

Operational Projects can be aggregated on the following basis

* A single meter must be used to measure generated power on both the existing portion of the project and the new portion of the project.
* Compensation and incentives in place at the time of interconnect of the aggregated project will apply to both the new and existing arrays.
* Developer must demonstrate the viability of obtaining a local building/zoning permit.

Projects Which are Ineligible to be Aggregated

* Projects which are not located on the same or adjacent parcels.
* An existing project that will not agree to be serviced by the same meter as the aggregated project.