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December 3, 2015

Electronic Mail secretary@dps.ny.gov

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, New York 12223-1350

Re: Case 15-E-_____ Verified Petition of Albany Engineering Corporation for a Declaratory Ruling Regarding the Eligibility of the Mechanicville Hydroelectric Station to Participate in the Remote Net Metering Program Under Public Service Law Section 66-j

Dear Secretary Burgess:

Enclosed for filing on behalf of Albany Engineering Corporation is a verified petition for a declaratory ruling regarding eligibility of the Mechanicville Hydroelectric Station to Participate in the Remote Net Metering Program Under Public Service Law Section 66-j.

Respectfully submitted

John W. Dax

JWD:lmd
Enclosures
cc (via email): Thomas V. Higgins, National Grid
Janet M. Audunson, Esq., National Grid
Christina Palmero
Len Van Ryn

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of	:	
Verified Petition of Albany Engineering Corporation for a Declaratory Ruling Regarding the Eligibility of the Mechanicville Hydroelectric Station to Participate in the Remote Net Metering Program Under Public Service Law Section 66-j	:	15-E-_____

VERIFIED PETITION OF ALBANY ENGINEERING CORPORATION FOR A DECLARATORY RULING REGARDING THE ELIGIBILITY OF THE MECHANICVILLE HYDROELECTRIC STATION TO PARTICIPATE IN THE REMOTE NET METERING PROGRAM UNDER PUBLIC SERVICE LAW SECTION 66-j

Dated: December 3, 2015
Albany, New York

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STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

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Verified Petition of Albany Engineering Corporation for a Declaratory Ruling Regarding the Eligibility of the Mechanicville Hydroelectric Station to Participate in the Remote Net Metering Program Under Public Service Law Section 66-j	:	Case 15-E-_____

INTRODUCTION

Albany Engineering Corporation (AEC) petitions the New York State Public Service Commission (Commission) for a declaratory ruling pursuant to Part 8 of the Commission's Rules (16 NYCRR Part 8) and Section 204 of the State Administrative Procedure Act that each of the two turbine generator arrays coupled to separate and independent 2000 kW frequency conversion facilities that comprise AEC's Mechanicville Hydro Electric Project (Mechanicville Station) meet the definition of micro-hydroelectric generating equipment of Section 66-j of the Public Service Law (PSL), because each is operated and interconnected independently and because the rated capacity of each is not more than 2000 kW.[1] This petition presents a unique opportunity for the Commission to demonstrate its commitment to promoting small scale generation and customer-based energy solutions, without compromising its commitment to enforcing the eligibility requirements for remote net metering. Using power produced by the historic Mechanicville Station, which was built in 1897 (making it the oldest, continuously operated hydroelectric station in the United States) and still operates with the original generators designed

[1] PSL § 66-j(1)(h) provides that " 'Micro-hydroelectric generating equipment' means a hydroelectric system… in the case of a non-residential customer, with a rated capacity of not more than two thousand kilowatts."

by Charles Proteus Steinmetz (the electrical engineering genius of the General Electric Company), to supply fast charging electric vehicle charging stations would send a strong signal that New York is committed to the wise use of its legacy of renewable energy.

DISCUSSION

I. THE MECHANICVILLE STATION'S UNIQUE CONFIGURATION.

The Mechanicville Station is comprised of two hydroelectric generating systems each of which is separately and independently interconnected to National Grid's electric system. Each system consists of an array of three turbine generators, each with a rated capacity of 750 kilowatts, all operating at a frequency of 40 Hz (40 Hz Turbine Generators). Each array independently drives a frequency converter rated at 2000 kW, operating at a frequency of 60 Hz (Frequency Converter). The 40 Hz Turbine Generators are not, and cannot be, directly connected to the National Grid system. Rather, each array of three turbine generators mechanically transfers power to a Frequency Converter in order to create power at usable frequencies and voltages for delivery to National Grid's 34.5 kV system. The Frequency Converters are electrically interconnected to separate 34.5 kV circuits in National Grid's electric system, each through its own transformer, meter and interconnection point. Each of the two turbine generator arrays and associated Frequency Converters can operate independently of the other. Each can be started, shut down and run independently of the other. Other than the building that houses them, the two systems share no common equipment.

The unique configuration of the Mechanicville Station described above, including the use of separate interconnection points on two separate and distinct circuits, was designed by the predecessor of Niagara Mohawk Power Corporation (NMPC) to increase reliability and black start capability for the five major transmission lines that feed through National Grid's Hudson

River Road switchyard adjacent to the Mechanicville Station. This configuration, which still exists today, is detailed in an Operating Manual dated June 3, 1980 (Operating Manual) that was provided to AEC by NMPC in 1987 when AEC assumed responsibility for operation of the facility. The Operating Manual is attached hereto as **Exhibit A**.

II. AEC'S AGREEMENT WITH STEWART'S SHOPS, INC.

By letter dated May 21, 2015, AEC submitted to NMPC d/b/a National Grid (National Grid) a letter designating the two existing meter accounts at the Mechanicville Station as host accounts for Remote Net Metering (RNM). A copy of the May 21 letter is attached as **Exhibit B**. As explained in the May 21 letter, AEC has an agreement with Stewart's Shops Corporation (Stewarts) under which AEC will install electric vehicle fast charging stations at Stewart facilities located throughout the New York Independent System Operator's (NYISO) Zone F – Capital Load Area and take ownership of the National Grid electric service accounts for such facilities. The clean electricity generated at the Mechanicville Station would be the source of the monetized, remotely metered generation used to supply those accounts.

AEC has explained to National Grid the reasons (described above) for concluding that each of the Mechanicville Station's systems qualifies under Section 66-j. *See* letter dated September 9, 2015, attached as **Exhibit C**. National Grid's position is that the Mechanicville Station is ineligible to participate in net metering because the aggregate capacity of Mechanicville Station is greater than 2 MW. *See* email from Thomas V. Higgins of National Grid, dated September 2, 2015, attached as **Exhibit D**. National Grid arrived at this conclusion without addressing the peculiar complexity of the Mechanicville Station, or that the Mechanicville Station consists of two independent systems, or that the total capacity figure it relies on is not capacity that can produce power that can be delivered into the National Grid

system. National Grid nevertheless indicated that seeking guidance from the Department of Public Service would be a prudent course (*id.*).

III. THE ELIGIBILITY REQUIREMENTS OF PSL § 66-j AND THE COMMISSION'S IMPLEMENTING ORDERS.

Section 66-j limits eligibility for participation in the RNM program to non-residential hydroelectric systems that have a rated capacity of no more than 2000 kW. The Commission has addressed eligibility requirements generally in the *NEM Cap Order* and the *Clarifying Order*,[2] and the 2 MW limit, specifically, in a declaratory ruling involving another AEC facility[3] and in an order denying a complaint by Boxler Dairy Farm.[4]

The *NEM Cap Order* summarized the three criteria for eligibility, as follows:

> [each 2 MW facility] must be separately metered and interconnected to the utility delivery system, separately sited, and separately operated.

(*NEM Cap Order* at 16). The Mechanicville Station's two hydroelectric generating systems meet all but the "separately sited" criteria. The extensive discussion in the *NEM Cap Order* of the "separately sited" requirement demonstrates that this requirement was fashioned to address the particular ease with which solar arrays can be divided into separate 2 MW projects and thereby undermine the State's policy of promoting the "installation of numerous small…

[2] Case 14-E-0151 and 14-E-0422, *Order Raising Net Metering Minimum Caps, Requiring Tariff Revisions, Making Other Findings, And Establishing Further Procedures* (*NEM Cap Order*) issued December 15, 2014 and *Order Clarifying Prior Order*, issued January 9, 2015 (*Clarifying Order*).

[3] Case 15-E-0282, Petition of Albany Engineering Corporation for a Declaratory Ruling Regarding Eligibility of Micro-Hydroelectric Generating Equipment for Remote Net Metering Pursuant to Public Service Law Section 66-j, Declaratory Ruling on the 2 MW Standard for Net metering Eligibility, *Declaratory Ruling on the 2 MW Standard for Net Metering Eligibility* (Issued and Effective August 14, 2015) (*2 MW Ruling*).

[4] Case 09-E-0608, Complaint of Boxler Dairy Farm Regarding the Costs of Interconnecting a Net Metered Farm Waste Generator, *Order Denying Complaint and Making Other Findings* (April 16, 2010) (*Boxler Dairy Order*).

facilities distributed widely across utility service territories" (*id.* at 17-18). Relaxing this one requirement in this particular case will not undermine that policy.

At issue in *Boxler Dairy*, was whether "rated capacity" as applied to "farm waste electric generating equipment" was to be determined by reference to the nameplate capacity of the generator to be employed by Boxler, which exceeded the then-applicable limit of 500 kW, or by reference to the entirety of the "equipment," which, Boxler argued, included devices that would keep output below the 500 kW limit. The Commission rejected Boxler's argument because it disagreed with the factual assertion that Boxler's farm waste electric generating equipment "cannot generate 570 kW" (the generator nameplate) (*Boxler Dairy Order* at 9). The Commission found instead:

> The other components of the generator facility are capable of producing the requisite energy. Unlike the 570 kW nameplate rating of the generator, the 500 kW estimated rating of the gas turbine engine driving Boxler's generator is only approximate. Like any gas-fired turbine, that engine is capable of exceeding its estimated rating under certain circumstances, and Boxler's waste digester is capable of producing enough fuel to push the turbine's output well over 500 kW.

(*Id.* at 9).

As an additional basis for its order the Commission accepted National Grid's argument that the generator's potential current contribution in the event of a fault would be measured by its generator nameplate rating (*id.* at 9-10). The Commission went on to distinguish the "large 80 MW facilities" cited by Boxler, stating that such generators are "separated from the electric grid by a substation" or otherwise by robust protective equipment (*id.* at 10). The facts surrounding the Mechanicville Station satisfy each of the concerns that led the Commission to its decision in *Boxler Dairy Order*. The rated capacity of the Frequency Converters caps the output that can be

delivered into National Grid's system at 2000 kW and the National Grid system is fully protected from any fault currents that could be created by the 40Hz Turbine Generators.

The sole question in the Commission's *2 MW Ruling* was whether "nameplate capacity" is the appropriate benchmark for determining a facility's "rated capacity," in contrast to a facility's unforced capacity as reported to NYISO by the interconnected utility (*2 MW Ruling* at 6). In the *2 MW Ruling* the Commission stated that "generator nameplate capacity has been established as the correct standard," and concluded that using a different standard for different technologies "would result in discriminatory treatment" and, specifically, that the reported unforced capacity rating "is only approximate" and can be exceeded (*2 MW Ruling* at 5-6), whereas the nameplate rating is permanent (*id.* at 6). Unlike the unforced capacity rating of the *2 MW Ruling*, the 2000 kW rating of the Frequency Converters is a fixed and permanent cap.

IV. REQUEST FOR A DECLARATORY RULING.

In the *NEM Cap Order* the Commission stated:

> The merits of any particular project proposal under this three factor test will not be decided here. Instead, utilities are to apply the factors to interconnection proposals as they are presented. As with existing net metering policy, if a utility and a developer cannot agree on the application of the three factor test, they may request assistance from Staff or petition the Commission for relief.

(*NEM Cap Order* at 23). AEC seeks a declaratory ruling that based on the particular, pre-existing circumstances and conditions surrounding the Mechanicville Station's design and operations (i) each of its two systems meets the eligibility requirements and (ii) the separately sited condition will be relaxed. In light of the peculiar, if not unique, circumstances of the Mechanicville Station, each of the two 40 Hz Turbine Generator arrays coupled to a 2000 kW Frequency Converter is a hydroelectric system and, therefore, non-residential, micro-

hydroelectric generating equipment for purposes of eligibility under PSL § 66-j. The 2000 kW rated capacity of each of the Frequency Converters meets the maximum capacity criterion of Section 66-j. Each of these systems is separately operated and is separately interconnected to separate circuits, each can deliver no more than 2000 kW of power and each can operate independently of each other.

A ruling declaring that the Mechanicville Station consists of two independent micro-hydroelectric generating systems and that the original design rated capacity of the Mechanicville Station's Frequency Converters, as expressed in the Operating Manual prepared by NMPC, can be used to determine their eligibility to participate in the RNM program would be entirely consistent with the *Boxler Dairy Order* and the *2 MW Ruling* and would promote the State's objectives in promoting small scale distributed generation. Each is separately and independently operated, metered and interconnected. The output of each cannot exceed 2000 kW regardless of the power being generated by the hydroelectric turbine generators. For each the 2000 kW rating is established by NMPC's Operating Manual. Finally, by the very nature of the Station's configuration, the National Grid system is wholly insulated from any fault currents that could be produced by the Mechanicville Station. For all of those reasons, use of the Frequency Converter rating would be entirely compatible with the *Boxler Dairy Order* and the *2 MW Ruling*.

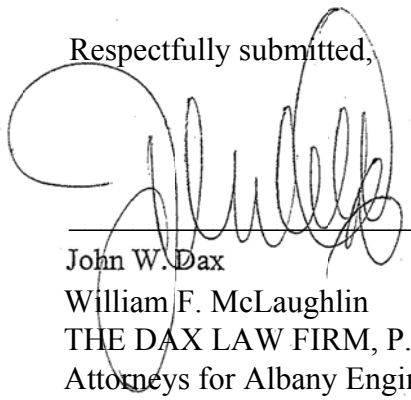
Finally, relaxing the separately sited requirement in recognition of the historic configuration of the Mechanicville Station and limited to these particular circumstances would advance the State's policies without upending the manner of their implementation or undermining the objectives expressed by the Commission in the *NEM Cap Order* and *Clarifying Order*. Alternatively, the Commission should indicate that a deed transfer will suffice to meet the separately sited standard.

CONCLUSION

Based on the forgoing, Petitioner requests that the Commission issue a ruling declaring that, on these facts, each of the Mechanicville Station's two Turbine Generator arrays coupled with a 60 Hz Frequency Converter is eligible for participating in remote net metering as non-residential micro-hydroelectric generating equipment. The Commission and Legislature created the RNM program to advance the State's renewable and distributed generation energy policies. AEC's plans to couple its hydroelectric generating assets at the Mechanicville Station with the installation of electric vehicle fast charging stations through the RNM program is exactly the type of cooperative, creative opportunity the Commission should support to take full advantage of the RNM program.

Dated: December 3, 2015
Albany, New York

Respectfully submitted,



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VERIFICATION

STATE OF NEW YORK)
) SS:
COUNTY OF ALBANY)

I, JAMES A. BESHA, being duly sworn, deposes and says: I am the President of ALBANY ENGINEERING CORPORATION, a New York corporation, the petitioner herein; I have read the foregoing Verified Petition and know the facts presented therein with respect to ALBANY ENGINEERING CORPORATION, to be true and accurate based on the information and records available to me as the President of the corporation.

JAMES A. BESHA

Sworn to before me this
3rd day of December, 2015

Notary Public

WENDY JO CAREY
Notary Public, State of New York
No. 01CA4998474
Qualified in Rensselaer County
Commission Expires June 29, 2018

EXHIBIT LIST

Exhibit A – Niagara Mohawk Power Corporation Operating Manual dated June 3, 1980

Exhibit B −AEC letter to National Grid dated May 21, 2015

Exhibit C – AEC letter to National Grid dated September 9, 2015

Exhibit D − Email from Thomas V. Higgins of National Grid, dated September 2, 2015

EXHIBIT A

MECHANICVILLE HYDRO
OPERATING INSTRUCTIONS
6/3/80

INDEX

SECTION II

GENERAL INFORMATION

A. LOCATION

1. Situated on the Hudson River.

2. Located outside the Village of Mechanicville at Lock 2 of Champlain Canal System.

B. POWERHOUSE

1. Constructed in 1897.

C. DAM

1. Of a masonry type construction.

2. Station makes up portion of dam.

3. Lock #2 makes up portion of dam.

4. Dam is 854' in length - Dam proper is owned by New York State.

5. Stonecrest is recognized to be 47.04' above sea level.

6. Low level of drawdown on pond recognized to be stonecrest.

D. UNIT STATISTICS

1. Six Units Operational -

a. General Electric - S. Morgan Smith Turbine

b. Horizontally designed

c. 750 k.v.a.

d. 1.0 power factor

e. 114 r.p.m.

f. 40 cycle

g. 12000 v.a.c.

h. 18' head

i. 36 armature amps (a.c.)

GENERAL INFORMATION (cont'd)

2. Two Waterwheel Exciters -

   a. 125 v.d.c.

   b. 800 amp

   c. 280 r.p.m.

   d. governor controlled

   NO unit

3. Two Static Rectifiers (#1 and #2)

   a. Fed by 125 k.v.a., single phase, 2400-240 v.a.c. banks

4. Two Freq Changers

   a. 60 cycle -

      1. 600 r.p.m.

      2. 2000 k.w.

      3. 0.8 p.f.

      4. 628 a.c. amps

      5. 2300 v.a.c.

   b. 40 cycle -

      1. 600 r.p.m.

      2. 0.85 p.f.

      3. 2650 k.v.a.

      4. 139 amp

      5. 11000 v.a.c.

      6. 2800 h.p.

E. CONTROLLERSHIP INFORMATION

1. Generation controlled by Syracuse System Operator via Albany District Operator -

   a. Any changes to be directed by or of permission of Albany District Operator

2. Traveling Operator -

   a. To be local controller on generators, station equipment, etc. in issuance of markups

E. CONTROLLERSHIP INFO (cont'd)

b. Responsible of all records of same.

F. SUPERVISORY CONTROL

1. Station alarm via telephone lines to NAlbany.

CONTROL BATTERY REPORT
FORM 110-13 R 8-560

[illegible]
AREA
STATION

NO. OF CELLS .... TYPE ....

PILOT CELL READINGS 9:00 A.M. DAILY PILOT CELL NO. ____					SPECIAL & EQUALIZING CHARGE READINGS RECORD READINGS EVERY 4 HOURS								
DATE	Bus Volts	Spec. Gravity	Temp. °F	By	DATE	TIME	Gen. Amps.	Bus Volts	Aver. V.P.C.	Spec. Gravity	Temp. F	By
1												
2												
3												
4												
5												
6												
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REMARKS

INDIVIDUAL CELL READINGS [illegible]
GRAVITY VOLTAGE

DATE ____
TIME ____
Surface level
Approx. Normal?
Av. Temp. ____ °F.
By ____

Gravity readings not corrected for temperature

III

D. STATION LOG -

1. Responsibility of Traveling Operator -

a. Make legible and concise notations in log;

b. Enter time in station in log;

c. Conditions of station;

d. River elevation;

e. Load output;

f. Ambient conditions;

g. Weather report;

h. Enter time leaving station.

IV A WATER CONTROL

1. Water level will vary while New York State Department of Transportation is locking thru boats, approximately .2.

2. Sluice Gates located east end of rackroom, operated by electrical hoist.

3. Device 63 wlx-e located in stillwell at east end of rackhouse -

   a. Set to trip units at 45.3' sea level;

   b. Trips #1, #2 and #3 units;

   c. Strip heater in stillwell to be utilized in winter conditions.

4. Device 63 wlx-w located in stillwell west end of rackhouse -

   a. Set to trip units at 45.3' sea level;

   b. Trips #4, #5 and #7 units;

   c. Strip heaters in stillwell to be utilized in winter conditions.

5. Pond Level Chart Apparatus -

   a. Located upstream outside of office;

   b. Float arrangement;

   c. Sequence -

      1. All units that are on pond control, motor at 47.0' sea level;

      2. Three minute timer starts; this is to prevent false operation from surging pond;

      3. After three minutes has elapsed and pond reaches a +.2 of water, all machines on pond control, except #3 (on selective control) will pick up load;

      4. After pond reaches a +.4 of water; #3 will pick up load.

   d. If it is desired to have any machine trip from line and remain so on low water conditions, set selector to auto time position and set 5-T switch to ON position.

      1. When such a unit goes to motor as above, unit will automatically trip from line when gates close.

B. GOVERNOR SYSTEM

1. Separate system for each unit -

a. Normal operating pressures marked on sides of pressure tanks (approximately 200 p.s.i.);

b. Normal level realized at one-half sight gauge in reservoir at bottom while maintaining 2" of oil in tank sight gauge;

c. Type of oil - Flowrex 300;

d. Governor oil pumps are internal to tanks and belt driven from generator shafts.

2. Blowing Down System -

a. Start air compressor west end of generator floor;

b. Check open valve labeled #1;

c. Open valve labeled #2;

d. Going to individual pressure tanks with airline connected, open valve at side of tank until desired level is reached at sight gauge;

e. When starting a unit that governor oil system pressure has been depleted, build pressure to approximately 150 p.s.i. and then roll the unit to stabilize system

C. LUBE OIL SYSTEM

1. Type of oil - DTE - heavy medium.

D. STATION WATER SUPPLY

1. Station facilities supplied from drilled well;

2. Fire protection supplied from #5 and #7 units water chambers.

E. SUMP PUMP (east end)

1. Vertically mounted;

2. Sump well arrangement;

3. On-Off actuated by float;

4. High water alarm actuated by float-mercury switch arrangement.

F. DIRECT CURRENT SUPPLIES FOR STATION

1. Static rectifiers;

2. Waterwheel exciter -

a. To start water wheel exciter:

F. DIRECT CURRENT SUPPLIES FOR STATION (cont'd)

1. At switchboard for #3 waterwheel check exciter resistance all the way in;
2. At switchboard check R93 open (this would only be necessary when station is down);
3. At switchboard check 9611 open;
4. At switchboard close 9311;
5. At pressure tank open valve #1 to pressure relief valve;
6. At pressure tank open valve #2 (main supply);
7. At governor open valve #3 (main supply);
8. Close valve #4 (bypass);
9. At governor, latch up belt break;
10. At governor, check oil cups full;
11. At governor, check temperature relays OK;
12. At governor, using gate stop, slowly bring exciter up to speed;
13. NOTE: Is possible to use hand controlwheel to start governor;
14. At switchboard, using rheostat to #3 waterwheel exciter, adjust d.c. voltage to 116 v.d.c..

G. PHASING OF UNITS

1. At governor tank -
   a. Check oil pressure to 150 p.s.i;
   b. Open main pressure valve;
   c. Open dump valve;
2. At governor -
   a. Latch up governor solenoid;
   b. Latch up belt break device;
   c. Open pilot valve;
   d. Open pressure valve;
   e. Push start button until machine rolls, allow to settle down at 1/4 gate or four teeth out (same are marked);
      NOTE: This could also be accomplished using hand controlwheel

G. PHASING OF UNITS (cont'd)

3. At switchboard, place 40 cycle plug in unit phasing. This will give indication of speed of unit;

4. At switchboard, check resistance all the way in on rheostat of unit phasing;

5. Close field switch;

6. Using governor, bring machine up to speed (40 cycle and voltage for phasing);

7. At approximately 38 cycles, put starting phasing plug in unit coming on, running plug in unit that is on; on 40 cy side of freq set

NOTE: #1 and #3 units can be phased against each other or against #8 freq set only; likewise, #4, #5, #7 units can be phased against each other or against #9 freq set only).

8. Upon reaching matched voltage and 40 cycles, close machine breaker on good scope;

9. Remove phasing plugs;

10. Raise field amps to approximately 80 amps utilizing rheostat, also bring 40 cycle side of set up to within limits;

11. Pick up load on machine and check 40 cycle voltage on freq set OK;

12. Check rotating equipment, latches, etc.

H. STATION DOWN FREQ SETS OFF -

1. Check rheostats on both sets, 40 cycle and 60 cycle cut in all the way;

2. Open or check open 7811, 8811 - 7922, 8922;

3. Check R38 and R39 open;

4. Open J668 and J619, check open J669 and J618;

5. Check R51 and R56 open;

6. Check R93 open;

7. Open 9611;

8. Start up #3 waterwheel exciter and bring voltage to 116 volts;

9. Close 9311;

10. Close R93 - Have generator to be used and set to be phased at standstill.

H. STATION DOWN FREQ SETS OFF (cont'd)

11. Close 8811 (40 cycle field on set); ROJ to 72 Amp

12. Close field breaker, adjust rheostat to 85 amps. Put in voltage plug;

13. Close machine breaker;

14. Start unit as in normal startup - bring speed up to approximately 40 cycles;

15. At freq set, close 60 cycle field (7811) - raise voltage to 4.1 k.v. (utilizing freq set 60 cycle rheostat);

16. Place starting plug in 60 cycle side of set;

17. Place running plug in any 34.5 kV circuit. (CAUTION: Use only one phasing plug at a time or will blow pot fuse);

18. Phase set at 4.1 kV and a good scope with R38;

19. After closing R38, bring 60 cycle field to 130 amps on set;

20. To change from #3 waterwheel exciter to rectifier exciter -

    a. remove generator from bus;

    b. cut in all resistance on exciter rheostat;

    c. cut in all resistance on 40 cycle and 60 cycle sides of set (DO NOT OPEN ANY FIELD SWITCHES OR R38);

    d. Trip R93;

    e. open 9311;

    f. close J668, J618;

    g. close R56;

    h. close 9611;

    i. close R93;

    j. raise fields on set 40 cycle and 60 cycle sides gradually alternating until you have 130 amps on 60 cycle side and 11.2 kV on 40 cycle side.

I STARTING #9 SET WHILE #8 SET IS RUNNING

1. Check 60 cycle and 40 cycle field open (7922-8922 respectively) and resistances cut all the way in to rheostats;

2. check R39 open;

3. check R51 open;

I STARTING #9 SET WHILE #8 SET IS RUNNING (cont'd)

4. check J619 open;

5. close J618;

6. check R51 closed;
6A. close R912.

7. close 8922 (40 cycle field of set), and adjust rheostat to 72 amps;

8. close field breaker, adjust rheostat to 85 amps; put 40 cycle plug in unit being utilized;

9. close machine breaker;

10. start selected unit rolling as normal, bring up to approximately 40 cycles;

11. close 7922 (60 cycle side of set;

12. place starting plug in 60 cycle side of set;

13. place running plug in any 34.5 kV circuit (CAUTION: ONE PLUG AT A TIME);

14. Phase set with R39 at approximately 4.1 kV and a good scope; use 60 Rheostat

15. adjust 60 cycle field to 135 amp on set;

16. adjust 40 cycle voltage to 11.2 kV with rheostat on 40 cycle side;

17. check k.w. and reactive OK;

18. check rotating equipment OK.
19. close J619. 20. open J618. 21. Lower Rheostat on unit to 72 amp

J STARTING #8 FREQ SET WHILE #9 FREQ SET IS RUNNING -

1. check 60 cycle and 40 cycle fields open, 7811 and 8811 resp. and resistances cut in all the way with rheostats;

2. check R38 open;

3. check R56 open;

4. check J668 open;

5. close J669;

6. close R56;

7. close R93;

8. close 8811 (40 cycle field of set) and adjust rheostat to 72 amps;

9. close GEN field breaker, adjust rheostat to 85 amps, place 40 cycle plug in unit utilizing;

J STARTING #8 FREQ SET WHILE #9 FREQ SET IS RUNNING (cont'd)

10. close machine breaker;

11. start selected unit rolling as normal, bring up to approximately 40 cycle;

12. close 7811 (60 cycle field of set);

13. place starting plug in 60 cycle side of set;

14. place running plug in any 34.5 kV circuit (CAUTION: ONE PLUG AT A TIME);

15. Phase set to system utilizing R38 at approximately 4.1 kV (this voltage to be realized thru operation of rheostat);

16. adjust 60 cycle field of set to 135 amps;

17. adjust 40 cycle voltage to approximately 11.2 kV;

18. check k.w. and reactive OK (should be zero or to lag);

19. check moving equipment OK.

20. close 668

21. open 669

V

A SECURING OF FREQ SETS

1. Secure generation from set, monitoring voltage within limits;

2. Close either J669 or J618 depending upon which set is coming off (this is to provide excitation to set after set circuit breaker is open providing a means to stop more quickly);

3. Turn in all resistance on 60 cycle side of set;

4. Upon reaching zero amps, open R38 or R39;

5. After set comes to a stop, cut in resistance on 40 cycle side of set;

6. Open 8922 and 7922, the 40 and 60 cycle side of #9 set resp. or open 8811 and 7811, the 40 and 60 cycle side of #8 set respectively.

B SECURING OF UNITS

1. Check float control 43 switch in manual position;

2. Motor unit from governor utilizing belt break device;

3. Open machine breaker, then ascertain that it is open;

4. Using rheostat, cut resistance all the way in;

5. Leaving field on, let unit stop;

6. After stopping, open field breaker;

7. At governor -

   a. Close pilot valve;

   b. Close pressure valve.

8. At governor pressure tank -

   a. Close pressure valve;

   b. Trip dump valve.

Niagara Mohawk System
Eastern Division
Station Operating Instructions
Station: Mechanicville Hydro

File No: 3
Sheet: 1 of 2
Revised: 8-13-69

FILE NO. 3 - CIRCUIT BREAKER RECLOSING SCHEDULE - MANUAL OPERATION

(For Automatic Reclosing Schedule, See Automatic Reclosing Data - File #8.)

*(For Mechanical Reclosing, See File No. 1 - General Instructions - Automatic Reclosing Circuit Breakers - Circuit or Equipment Dead, and Operating Manual - File No. 56 - Circuit Breaker Reclosing.)

CIRCUIT OR EQUIPMENT DEAD

Circuit or Equipment	CB	*Reclose	Refer to Note
34.5 KV			
Mechanicville-School St. #1	R1	Yes	
Mechanicville-Schaghticoke #3	R3	Yes	
Mechanicville-Schaghticoke #7	R7	Yes	
Halfmoon-Mechanicville #602	R602	Yes	
Ballston-Mechanicville #6	R6	Yes	
No. 8 Frequency Changer	R38, R93		
No. 1, 2, 3 Generator	R21, R22, R23		1
No. 9 Frequency Changer	R39, R91		
No. 4, 5, 7 Generator	R24, R25, R27		1
No. 8 Bank	J68, R38, R93		
	R21, R22, R23		2
No. 9 Bank	J69, R39, R91		
	R24, R25, R27		2

NOTE 1

If R38, R93, R21, R22, R23 have tripped, No. 8 Bank alive, No. 1, 2, 3, Units and No. 8 frequency changer have shut down:

Proceed as outlined in File No. 1 - General Instructions - Equipment Protective Devices - Miscellaneous Protective Devices.

Follow a similar procedure if R39, R91, R24, R25, R27 have tripped and No. 4, 5, 7 generators and No. 9 frequency changer have shut down.

NOTE 2

If No. 8 Bank is dead, J68 fuses blown, R38, R93, R21, R22, R23 have tripped No. 1, 2, 3 Units and No. 8 frequency changer have shut down:

Proceed as outlined in File No. 1 - General Instructions - Equipment Protective Devices - Transformer Differential Protection.

Proceed in a similar manner if No. 9 Bank is dead, J69 fuses blown R39, R91, R24, R25, R27 have tripped and No. 4, 5, 7 Units and No. 9 frequency changer have shut down.

Niagara Mohawk System
Eastern Division
Station Operating Instructions
Station: Mechanicville Hydro

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FILING DIRECTIONS

File in Station Operating Instructions - File No. 3.

Division Supervisor
Electric & Gas Control

Approved: _____
General Superintendent Operations

MH/dmt

Niagara Mohawk System
Eastern Division
Station Operating Instructions
Station: Mechanicville Hydro

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NORMAL SWITCH POSITION

NORMAL OPERATION

34.5 KV - Switches normally open
Either 77 or 99 Bus disconnects on all 34.5 KV circuits except 8377, 8399, 6977 and 6899.

12 KV - Switches normally open
6377, 2777, 2577, 2477, 2399, 2299, 2199

Directed By Station Operator

*All generator circuit breakers and station service switches.

All other switches normally closed.

*CAUTION: Generators and the frequency changer operating in parallel on the same A.C. bus must have their fields connected to the same exciter bus. See Notes 2 and 3 on Operating Diagram.

FILING DIRECTIONS

File in Station Operating Instructions - File No.2

E E Heath
Chief Power Dispatcher

Approved: [signature]
General Superintendent Operations

CT

MECHANICVILLE HYDRO
AUTOMATIC CONTROL FUNCTIONS

Mechanicville Hydro may be controlled by -

I Manually

II "Automatic Pond" by forebay float switch to increase or decrease generation depending on water level.

III "Automatic Time" - Shut down of machines on Auto Time by time clock.

NOTE: This type of shut down is monitored by the float switch. In event the time switch operates, the machines will not shut down until low pond switch operates to complete the shut down circuit.

GENERATORS

The generators are protected by 86-B lockout device for slow shut down. 86B trips the machine breaker, field breaker, opens gov. solenoid circuit and operates station alarm. (Station alarm will not ring when 86-B is tripped by time clock).

86-B is tripped by -

1. Time switch
2. 86-B relay on freq. set.
3. Bearing temp. (38)
4. Gov. oil pressure (63Q)
6. Water level aux. relay (63WLX)

Governor Belt Protection

In event the governor belt breaks - the flyballs collapse and mechanically trip the governor solenoid mechanism which shuts down the unit.

Frequency Changers

The frequency changers are protected by 86-B slow shut down lockout device for mechanical faults and 86-G fast shut down lockout device for electrical faults.

86-B Trips

1. The 60 cycle freq. set O.C.B. R-39 or R-38
2. Freq. set field breaker R-91 or R-93
3. 86-B devices on associated generators

86B is tripped by -

1. Exciter brearing temp. (38E)
2. Freq. Set. bearing temp. 40 & 60 cycle
3. Exciter ground detector (64F)

ECHANICVILLE HYDRO
AUTOMATIC CONTROL FUNCTIONS - Contd. Sheet 2

86-G Trips

1. The ~~60~~ 60 freq. set O.C.B. R-39 or R-38
2. Freq. set field breaker R-91 or R-93
3. Station Alarm
4. Opens gov. solenoid circuit on associated generators to exciters.

86-G is Tripped by -

1. 60 cycle and 40 cycle overcurrent relays (51)
2. Overcurrent relay neutral CT (51N) 40 & 60 cycle
3. A.C. overvoltage 40 & 60 cycle

W.F.M.

WM/NS
6/20/61

Niagara Mohawk System
Eastern Division
Hydro Data

Station: Mechanicville
Sheet: 1 of 1
Revised: 3-1-73

Elevation of Masonry Crest (U.S.G.S.)	47.0
Normal height of Flashboards (ft.)	0
Flow to vary pond .1 ft. per hour (C.F.S.)	
Max. above Masonry Crest for safe operation (ft.)	
Max. below Masonry Crest for safe operation (ft.)	0 *
Min. Winter elevation (Normal Operation)	- .2
Max. discharge thru waste gates (C.F.S.)	
MWHR per foot of Pondage	0

*See A.D.O. Manual File #1 - Pond & Storage Operating Level Order.

ELEVATION	MAX. HEAD FT.	MAX. CAPACITY MW.	MAX. FLOW C.F.S.	EFFICIENT OPERATION				
				CAPACITY MW.	FLOW C.F.S.	C.F.S. PER KW.	KW. PER C.F.S.	AVG. KW. HR. PER C.F.S.D.
47.0	18	4.5	5400	3.75	4000	1.0		

UNIT RATINGS

UNIT NO.	RATED CAPACITY	CAPABILITY
1	.75 MW	.75 MW
3	.75 MW	.75 MW
4	.75 MW	.75 MW
5	.75 MW	.75 MW
7	.75 MW	.75 MW

NOTES

1. River flow station. Operation governed by New York State Barge Canal Requirements.
2. Elevation 46.6 (-.4) unseals draft tubes at West Virginia Pulp and Paper Co.

EXHIBIT B

The Dax Law Firm, P.C.

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Albany, New York 12207
www.daxlawfirm.com

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John W. Dax

William F. McLaughlin*
**Also Admitted in Massachusetts & District of Columbia*

May 21, 2015

Via Email Thomas.Higgins@nationalgrid.com
and First Class Mail

Thomas V. Higgins CEM
Lead Technical Support Consultant
Technical Sales & Engineering Support - UNY
National Grid
300 Erie Blvd West
Syracuse, New York 13202

Re: Remote Net Metering – Mechanicville Hydroelectric Project/Stewart's Shops

Dear Mr. Higgins:

Pursuant to Public Service Law Section 66-j and the Public Service Commission orders implementing Section 66-j issued in Cases 14-E-0151 and 14-E-0422, our client Albany Engineering Corporation (AEC) hereby designates its Mechanicville Hydroelectric Project as the host for the remote net metering arrangement described herein.

AEC has executed a letter of intent with Stewart's Shops Corp. (Stewart's Shops) to enter into a commercial relationship under which AEC will, at its expense, install, operate and maintain DC Fast Charger stations and all required electrical upgrades at Stewart's Shops facilities located in the New York Independent System Operator (NYISO) Zone F – Capital Load Area. AEC will assume responsibility for the supply of electric service to the Stewart's Shops facilities in which DC Fast Charger stations are installed, including ownership of the National Grid electric service accounts for such facilities. Stewart's Shops currently has 186 facilities located in Zone F. AEC plans to install approximately 30-40 DC Fast Charger stations per year and to make the installations over a five year period.

Electricity generated by the Mechanicville Hydroelectric Project's two turbine-generator arrays will be the source of the monetized, remotely metered generation used to supply the Stewart's Shops accounts that are transferred to AEC. Although Niagara Mohawk aggregates the production from the two arrays for purposes of reporting total production, each of the two turbine-generator arrays is separately and independently operated and connected to the National Grid system (respectively, via National Grid bus 6899 and National Grid bus 6877), and each has

its own independent and separate meter. As a consequence, each turbine generator array is a separate production facility and because each is less than 2 MW in both nameplate and rated capacity, each therefore meets the eligibility requirements of Section 66-j and the Public Service Commission's April 17, 2015 *Order Granting Rehearing In Part, Establishing Transition Plan, and Making Other Findings.*

A list of the Stewart's Shops facilities located in Zone F, including the National Grid account numbers, is attached. AEC will be evaluating each location and will develop an order of priority by which the DC Fast Chargers will be installed and the National Grid accounts transferred to AEC.

Please contact me if you require any additional information.

Very truly yours,

THE DAX LAW FIRM, P.C.

John W. Dax

JWD:lmd

Enclosure

Attachment Stewart's Shops Zone F

Latitude	Longitude	Provider	Shop #	Account #'s	Address	City	County	Name	Description
43.018155945	-73.78978299	National Grid	**20**	8581364103	2907 STATE ROUTE 9	BALLSTON SPA	SARATOGA	RIDGE	Admin
43.084295851	-73.74327229	National Grid	**101**	4965224108	402 LAKE AVENUE	SARATOGA SPRINGS	SARATOGA	Weibel Ave	Shop
42.974768662	-74.15110406	National Grid	**102**	9039995106	123 S PAWLING ST.	HAGAMAN	MONTGOMERY	Hagaman	Shop & Rental
44.046792177	-73.45944413	National Grid	**103**	4715130102	4300 MAIN ST	PORT HENRY	ESSEX	Port Henry	Shop
43.083414391	-73.78659657	National Grid	**104**	9167613102	30 CHURCH ST	SARATOGA SPRINGS	SARATOGA	Woodlawn Ave	Shop
42.615159089	-73.8518951	National Grid	**105**	8810094107	624 DELAWARE AVE	DELMAR	ALBANY	Elm Ave	Shop
42.999248579	-74.68135043	National Grid	**106**	3691551008	52 W. MAIN ST	ST JOHNSVILLE	MONTGOMERY	St. Johnsville	Shop
43.224905600	-74.1713184	National Grid	**107**	5540042103	192 S. MAIN ST	NORTHVILLE	FULTON	Northville	Shop
42.856296335	-73.8885224	National Grid	**109**	2973064007	923 RIVERVIEW RD	REXFORD	SARATOGA	Rexford	Shop
42.818852685	-73.9151111	National Grid	**110**	4960147106	1229 NOTT ST	SCHENECTADY	SCHENECTADY	Nott St	Shop
42.736703462	-73.76116211	National Grid	**111**	2245094108	567 WATERVLIET SHAKER RD	LATHAM	ALBANY	Latham	Shop
42.824279157	-73.7328746	National Grid	**112**	5964001102	1403 ROUTE 9	CLIFTON PARK	SARATOGA	Crescent	Shop & Rental
42.722160234	-73.67485672	National Grid	**115**	5119084100	2 BRUNSWICK RD	TROY	RENSSELAER	Brunswick Rd	Shop
43.305324499	-73.65558716	National Grid	**117**	2237677102	118 BROAD ST	GLENS FALLS	WARREN	Broad St	Shop & Rental
42.932058676	-74.62196142	National Grid	**118**	8708755102	18 WILLETT ST	FORT PLAIN	MONTGOMERY	Fort Plain	Shop
42.769657328	-73.70421667	National Grid	**122**	689876104	94 COLUMBIA ST	COHOES	ALBANY	Cohoes	Shop
43.285691421	-73.58639607	National Grid	**123**	690433008	378 BROADWAY	FORT EDWARD	WASHINGTON	Gates Ave	Shop
42.653240605	-73.78802204	National Grid	**124**	3083021008	285 NEW SCOTLAND AVE	ALBANY	ALBANY	New Scotland Ave	Shop & Rental
43.494861000	-73.77259566	National Grid	**125**	6008934009	3827 MAIN ST	WARRENSBURG	WARREN	Warrensburg NEW	Shop
42.597479110	-74.33323881	National Grid	**128**	5340155101	288 MAIN ST/PO BOX 646	MIDDLEBURGH	SCHOHARIE	Middleburgh	Shop
43.075205790	-73.78663107	National Grid	**130**	2021366103	8 CIRCULAR ST.	SARATOGA SPRINGS	SARATOGA	Circular St	Shop & Rental
42.771209189	-73.67906292	National Grid	**131**	1512603101	9-112TH ST	TROY	RENSSELAER	112th St	Shop & District Office
42.674175905	-73.81657444	National Grid	**133**	8281205103	1050 WESTERN AVE	ALBANY	ALBANY	Russell Road	Shop
42.714891647	-73.69349379	National Grid	**134**	4259072103	487 FOURTH ST	TROY	RENSSELAER	South Troy	Shop
42.769018065	-73.87490244	National Grid	**135**	844020104	4240 CONSAUL RD	SCHENECTADY	SCHENECTADY	Avon	Shop
42.971315940	-73.79269893	National Grid	**136**	7941364108	2505 ROUTE 9	BALLSTON SPA	SARATOGA	Malta	Shop
42.757196876	-73.61662791	National Grid	**139**	3573784105	985 HOOSICK ROAD	TROY	RENSSELAER	Center Brunswick	Shop
42.701134638	-73.81963284	National Grid	**140**	5475073007	35 FULLER RD	ALBANY	ALBANY	Fuller Rd	Shop & District Office
43.052051203	-74.19846068	National Grid	**143**	5759958109	47 S.SECOND AVE	BROADALBIN	FULTON	Broadalbin	Shop
42.676380790	-74.49232105	National Grid	**145**	7500792000	391 W.MAIN STREET	COBLESKILL	SCHOHARIE	Cobleskill	Shop
42.954456691	-74.37718477	National Grid	**146**	8055969007	38 WEST MAIN ST	FONDA	MONTGOMERY	Fonda	Shop
43.848217793	-73.43218038	National Grid	**148**	6477570108	26 MONTCALM ST	TICONDEROGA	ESSEX	Ticonderoga	Shop & District Office
43.095243128	-73.50735602	National Grid	**150**	5078111060	204 MAIN STREET	GREENWICH	WASHINGTON	Greenwich	Shop
42.751817951	-73.68139265	National Grid	**151**	7553800102	3283 SIXTH AVENUE	TROY	RENSSELAER	Glen Ave	Shop
42.654127778	-73.77272778	National Grid	**152**	891272129	10 NEW SCOTLAND AVE	ALBANY	ALBANY	Dana Ave	Shop & Rental
42.664959601	-74.31094947	National Grid	**153**	5180068003	102 JOHNSON AVE	SCHOHARIE	SCHOHARIE	Schoharie	Shop
42.663743892	-73.77509917	National Grid	**154**	1988674103	515 WASHINGTON AVE	ALBANY	ALBANY	Quail St	Shop
42.516423047	-73.611874	National Grid	**158**	7010197106	19 ALBANY AVE	NASSAU	RENSSELAER	Nassau	Shop
43.310838873	-73.6311707	National Grid	**159**	7742575101	196 WARREN ST	GLENS FALLS	WARREN	Warren St	Shop
42.811887047	-73.93580951	National Grid	**164**	280140105	120 NOTT TERRACE	SCHENECTADY	SCHENECTADY	Nott Terrace	Shop
42.707619390	-73.92275123	National Grid	**167**	7381832003	2446 WESTERN AVENUE	ALTAMONT	ALBANY	Guilderland	Shop & Rental
42.910810920	-74.57096357	National Grid	**169**	3609958100	6 W.GRAND ST	PALATINE BRIDGE	MONTGOMERY	Palatine Bridge	Shop
43.027241362	-73.3762011	National Grid	**170**	4527623109	2A SOUTH PARK ST	CAMBRIDGE	WASHINGTON	Cambridge	Shop
43.044240792	-74.86012144	National Grid	**171**	4324666000	32 N ANN ST	LITTLE FALLS	HERKIMER	Little Falls	Shop
42.909153970	-73.87548541	National Grid	**172**	6196428105	26 MAIN ST.	BALLSTON LAKE	SARATOGA	Ballston Lake	Shop
42.652299158	-73.92830001	National Grid	**173**	2661233103	42 SOUTH MAIN ST	VOORHEESVILLE	ALBANY	Voorheesville	Shop
43.666027575	-73.78365825	National Grid	**174**	6592619108	6151 STATE ROUTE 8	CHESTERTOWN	WARREN	Chestertown	Shop
42.619636734	-73.78377529	National Grid	**176**	6667494104	33 FRONTAGE RD	GLENMONT	ALBANY	Glenmont	Shop
42.713101396	-73.7075247	National Grid	**178**	8623647109	309 6TH ST & 3RD AVE	WATERVLIET	ALBANY	Third Ave	Shop
42.643594573	-73.76559963	National Grid	**179**	5187481102	164 MORTON AVE	ALBANY	ALBANY	Morton Ave	Shop
43.048285649	-74.34745054	National Grid	**180**	9336342109	76 SOUTH MAIN ST	GLOVERSVILLE	FULTON	South Main St	Shop
42.782853420	-73.89285636	National Grid	**181**	2084020102	566 BALLTOWN ROAD	NISKAYUNA	SCHENECTADY	Balltown Rd	Shop
42.800082787	-73.92873894	National Grid	**182**	257670107	100 S. BRANDYWINE	SCHENECTADY	SCHENECTADY	Brandywine Ave	Shop & Rental
42.803303953	-73.90064879	National Grid	**183**	2354029102	1739 UNION ST	SCHENECTADY	SCHENECTADY	Union St	Shop & Rental
42.703609324	-73.68822547	National Grid	**184**	6218880101	8 VANDENBURGH AVE	TROY	RENSSELAER	Vandenburg Ave	Shop
42.670843345	-73.77971917	National Grid	**185**	1666278101	542 CENTRAL AVE	ALBANY	ALBANY	Manning Blvd	Shop
42.677621478	-73.73505023	National Grid	**186**	9925084312	14 BROADWAY	MENANDS	ALBANY	Wolferts	Shop
42.781123638	-73.90451688	National Grid	**187**	1874025109	1773 STATE ST	SCHENECTADY	SCHENECTADY	State St	Shop
42.624260008	-73.82737968	National Grid	**188**	8050093106	309 DELAWARE AVE	DELMAR	ALBANY	Delmar	Shop
42.781086797	-73.95778404	National Grid	**189**	9595233103	1841 HELDERBERG	ROTTERDAM	SCHENECTADY	Curry Rd	Shop
42.735257482	-73.70061557	National Grid	**201**	2723644104	2458 SECOND AVE	WATERVLIET	ALBANY	Watervliet	Shop
43.195554072	-73.65129273	National Grid	**202**	7610065003	1917 ROUTE 32N	GANSEVOORT	SARATOGA	Gansevoort	Shop
42.700667112	-74.03390299	National Grid	**203**	6722418104	1001 ALTAMONT BLVD	ALTAMONT	ALBANY	Helderberg	Shop
42.691209789	-73.86902612	National Grid	**204**	787503100	1827 WESTERN AVE	ALBANY	ALBANY	Westmere	Shop
43.026329425	-73.79208894	National Grid	**205**	3673055003	2951 ROUTE 9	BALLSTON SPA	SARATOGA	Bottom Of The Hill	Shop
42.805066363	-73.66721041	National Grid	**206**	1909030101	105 HUDSON RIVER RD	WATERFORD	SARATOGA	Waterford	Shop
43.092538038	-73.77241948	National Grid	**208**	8260129108	11 MAPLE DELL	SARATOGA SPRINGS	SARATOGA	Marion Ave	Shop & Rental
42.247586957	-73.77312186	National Grid	**209**	5734901104	13 FAIRVIEW AVE	HUDSON	COLUMBIA	Hudson	Shop
42.729243485	-73.76040817	National Grid	**210**	3789392055	605 LOUDON ROAD	LATHAM	ALBANY	Loudon Road	Shop
43.550120512	-73.39721202	National Grid	**211**	190043013	60 POULTNEY ST	WHITEHALL	WASHINGTON	Whitehall	Shop
42.780992342	-73.6702396	National Grid	**212**	1836046006	764 FIFTH AVE	TROY	RENSSELAER	Fifth Ave	Shop & Rental
42.610633333	-73.72649006	National Grid	**214**	2071406107	326 COLUMBIA TPK	RENSSELAER	RENSSELAER	East Greenbush	Shop
43.267121067	-73.58503626	National Grid	**215**	8410355009	107 BROADWAY	FORT EDWARD	WASHINGTON	Fort Edward	Shop
43.298895353	-73.63526657	National Grid	**216**	73831106	3 SARATOGA AVE	SO GLENS FALLS	SARATOGA	South Glens Falls	Shop
42.944237281	-74.19831498	National Grid	**217**	4024933108	151 GUY PARK AVE	AMSTERDAM	MONTGOMERY	Guy Park Ave	Shop
43.322087531	-73.64317928	National Grid	**218**	4085226100	255 RIDGE STREET	GLENS FALLS	WARREN	Ridge St	Shop
42.896627484	-73.35161754	National Grid	**219**	1540122102	2 RIVER ST	HOOSICK FALLS	RENSSELAER	Hoosick Falls	Shop
43.411077525	-73.71096031	National Grid	**220**	2073569009	2164 State Route 9	LAKE GEORGE	WARREN	Lake George	Shop
43.300464368	-73.58625248	National Grid	**223**	6947622108	173 MAIN STREET	HUDSON FALLS	WASHINGTON	Hudson Falls	Shop
43.006550729	-74.37109324	National Grid	**224**	4963742103	1-19 EAST MAIN ST	JOHNSTOWN	FULTON	Johnstown	Shop & District Office
42.794400281	-74.00489536	National Grid	**226**	5815239103	672 MARIAVILLE ROAD	ROTTERDAM	SCHENECTADY	Burdeck Rd	Shop
43.022703075	-73.83942383	National Grid	**229**	2464007101	201 NORTHLINE RD	BALLSTON SPA	SARATOGA	Northline Road	Shop
42.826750821	-73.96438873	National Grid	**230**	1936455105	204 MOHAWK AVE	SCOTIA	SCHENECTADY	Mohawk Ave	Shop
42.655080472	-73.81763592	National Grid	**231**	4005382010	875 NEW SCOTLAND AVE	ALBANY	ALBANY	Whitehall Rd	Shop
42.942483461	-74.1882512	National Grid	**233**	689956107	132 MARKET ST	AMSTERDAM	MONTGOMERY	Market Street	Shop
42.772690175	-73.82471893	National Grid	**234**	4712274009	1218 TROY-SCHENECTADY RD	LATHAM	ALBANY	Vly Rd	Shop & Rental
43.835642993	-73.76185082	National Grid	**236**	9963738104	1068 US ROUTE 9	SCHROON LAKE	ESSEX	Schroon Lake	Shop
42.223162957	-73.82625845	National Grid	**239**	95062016	5805 ROUTE 9G	HUDSON	COLUMBIA	Greenport	Shop
42.541170058	-73.80575194	National Grid	**240**	927498100	1344 RT 9W	SELKIRK	ALBANY	Selkirk	Shop
42.928155642	-73.34262189	National Grid	**243**	3320119107	4702 NY ROUTE 67 /P.O. BOX 118	NORTH HOOSICK	RENSSELAER	North Hoosick	Shop
42.739317808	-73.67957295	National Grid	**244**	4573798100	110 HOOSICK ST	TROY	RENSSELAER	Hoosick St	Shop
43.171098127	-73.71768608	National Grid	**246**	7227615131	225-227 BALLARD RD	GANSEVOORT	SARATOGA	Wilton	Shop & Rental
43.051424636	-74.32556486	National Grid	**247**	4590132106	1040 ST HIGHWAY 29A	GLOVERSVILLE	FULTON	Fulton St	Shop

Latitude	Longitude	Provider	Shop #	Account #'s	Address	City	County	Name	Description
43.101290346	-73.5806469	National Grid	**249**	7873832106	158 BROAD STREET	SCHUYLERVILLE	SARATOGA	Schuylerville	Shop
42.761540297	-74.13319119	National Grid	**250**	1858967004	5020 WESTERN TURNPIKE	DUANESBURG	SCHENECTADY	Duanesburg	Shop
42.994424887	-73.84982922	National Grid	**253**	3844997103	170 CHURCH AVE	BALLSTON SPA	SARATOGA	Church Ave	Shop
43.017231954	-74.19397776	National Grid	**254**	4969220017	4184 STHWY 30 (30&107)	AMSTERDAM	FULTON	Perth NEW	Shop
43.560386477	-73.65421997	National Grid	**255**	8223806100	5004 LAKE SHORE DRIVE	BOLTON LANDING	WARREN	Bolton Landing	Shop
43.319984719	-73.57272613	National Grid	**259**	9894038100	3765 BURGOYNE AVE	HUDSON FALLS	WASHINGTON	Dix Ave	Shop
43.330302651	-73.69753686	National Grid	**261**	2649037107	347 AVIATION RD	QUEENSBURY	WARREN	Aviation Road	Shop & Rental
42.645780135	-73.73887971	National Grid	**262**	5718876106	12 PARTITION ST	RENSSELAER	RENSSELAER	Rensselaer	Shop
42.697260236	-73.76846254	National Grid	**263**	3526291102	406 ALBANY SHAKER RD	LOUDONVILLE	ALBANY	Everett Rd	Shop
43.048412171	-73.84305222	National Grid	**265**	9611424106	404 GEYSER ROAD	BALLSTON SPA	SARATOGA	Geyser Rd	Shop & Rental
42.934026370	-74.18606778	National Grid	**266**	4170149107	183 EAST MAIN ST	AMSTERDAM	MONTGOMERY	East Main Street	Shop
42.663514594	-73.7586064	National Grid	**267**	2065088102	204 HENRY JOHNSON BLVD	ALBANY	ALBANY	Livingston Ave	Shop
42.971513889	-73.83121389	National Grid	**268**	414011108	801 ROUTE 67	BALLSTON SPA	SARATOGA	Eastline Road	Shop
42.798478396	-73.96375036	National Grid	**269**	9955246115	1905 BROADWAY	SCHENECTADY	SCHENECTADY	Fairview Ave	Shop
42.900818087	-73.9059585	National Grid	**271**	3908819100	710 SARATOGA RD	BURNT HILLS	SCHENECTADY	Burnt Hills	Shop
42.835896818	-73.93265199	National Grid	**275**	6944459005	50 FREEMANS BRIDGE RD	GLENVILLE	SCHENECTADY	Freemans Bridge	Shop & District Office
42.592934299	-73.9866522	National Grid	**277**	2941231109	2475 DELAWARE TNPKE	VOORHEESVILLE	ALBANY	Clarksville	Shop
43.013270676	-74.36048826	National Grid	**279**	5233716101	198 NORTH COMRIE AVE	JOHNSTOWN	FULTON	Comrie Ave	Shop & Rental
43.782241132	-74.26436408	National Grid	**280**	2123743100	6 EAST MAIN ST	INDIAN LAKE	HAMILTON	Indian Lake	Shop
43.397514160	-73.62324598	National Grid	**282**	4163809107	977 STATE ROUTE 149	LAKE GEORGE	WARREN	Queensbury	Shop
42.825495289	-73.9233813	National Grid	**283**	9036462100	1757 VANVRANKEN AVE	SCHENECTADY	SCHENECTADY	Van Vranken Rd	Shop
43.109012470	-74.26800631	National Grid	**284**	602454106	2481 ST HWY 30	MAYFIELD	FULTON	Mayfield	Shop
42.134560310	-73.89094426	National Grid	**285**	4022428104	4294 ROUTE 9G	GERMANTOWN	COLUMBIA	Germantown	Shop
42.750489921	-73.5726314	National Grid	**287**	9303946008	2 BRICK CHURCH RD	CROPSEYVILLE	RENSSELAER	Cropseyville	Shop
42.639580125	-73.78551744	National Grid	**291**	3107485104	470 DELAWARE AVE	ALBANY	ALBANY	Delaware Ave	Shop
42.740287119	-73.73647091	National Grid	**293**	5243635104	215 TROY-SCHENECTADY RD	LATHAM	ALBANY	Swatling Road	Shop
43.028348109	-73.92755955	National Grid	**295**	3635217107	101 WEST MILTON ROAD	BALLSTON SPA	SARATOGA	West Milton	Shop
42.836782582	-73.82087264	National Grid	**296**	1273819105	645 GROOMS RD	CLIFTON PARK	SARATOGA	Grooms Road	Shop & Rental
42.860419982	-73.98133793	National Grid	**300**	436449115	571 SACANDAGA ROAD	SCOTIA	SCHENECTADY	Sacandaga Rd	Shop
42.579445069	-73.87508097	National Grid	**304**	6627503106	1360 INDIAN FIELDS ROAD	FEURA BUSH	ALBANY	Feura Bush	Shop
43.682024622	-73.97262889	National Grid	**308**	5928824109	3196 STATE ROUTE 28	NORTH CREEK	WARREN	North Creek	Shop
43.122991332	-73.84663953	National Grid	**310**	7037654100	2532 ROUTE 9N	GREENFIELD	SARATOGA	Greenfield	Shop & Rental
43.119272483	-73.72593098	National Grid	**314**	6663804104	4208 RT 50	SARATOGA SPRINGS	SARATOGA	Jones Road	Shop & Rental
42.903361000	-73.586059	National Grid	**318**	8832589105	62 MAIN ST	SCHAGHTICOKE	RENSSELAER	Schaghticoke	Shop & District Office
42.956778875	-74.23184081	National Grid	**319**	8661912007	19 E. MAIN STREET	FORT JOHNSON	MONTGOMERY	Fort Johnson	Shop
42.773641681	-73.93587175	National Grid	**320**	6446138018	2740 HAMBURG ST	SCHENECTADY	SCHENECTADY	Hamburg	Shop
42.880166645	-74.03985434	National Grid	**324**	1156449107	5246 AMSTERDAM ROAD	SCOTIA	SCHENECTADY	West Scotia	Shop
42.789443468	-74.62239994	National Grid	**332**	8476465100	526 HIGHWAY ROUTE 20	SHARON SPRINGS	SCHOHARIE	Sharon Springs	Shop
43.079288185	-73.80408394	National Grid	**333**	845224106	87 WEST AVENUE	SARATOGA SPRINGS	SARATOGA	West Ave	Shop & Rental
42.697853941	-73.79179373	National Grid	**334**	4646292108	219 SAND CREEK RD	ALBANY	ALBANY	Osborne Rd	Shop
42.869952157	-73.8214657	National Grid	**335**	4168811107	1206 ROUTE 146	CLIFTON PARK	SARATOGA	Elnora	Shop
43.312922396	-73.83482023	National Grid	**336**	1973838104	114 LAKE AVENUE	LAKE LUZERNE	WARREN	Lake Luzerne	Shop
42.984384974	-73.74592619	National Grid	**341**	1561367101	504 ROUTE 9P	SARATOGA SPRINGS	SARATOGA	Saratoga Lake	Shop & Rental
43.051731969	-73.72121713	National Grid	**345**	2108050006	1456 ROUTE 9P	SARATOGA SPRINGS	SARATOGA	North Saratoga Lake	Shop & Rental
42.851893830	-73.34698771	National Grid	**346**	7620122104	4700 NY ROUTE 7	HOOSICK	RENSSELAER	South Hoosick	Shop
42.973270635	-74.02992909	National Grid	**348**	5696432108	2370 ROUTE 67	AMSTERDAM	SARATOGA	Scotch Church	Shop
42.402006765	-73.69485194	National Grid	**349**	8156304100	61 CHATHAM ST	KINDERHOOK	COLUMBIA	Kinderhook	Shop
42.771785018	-73.72819625	National Grid	**350**	6013193001	480 COLUMBIA ST	COHOES	ALBANY	West Cohoes	Shop
42.595767617	-74.73167233	National Grid	**351**	2953781105	342 MAIN STREET	WORCESTER	OTSEGO	Worcester	Shop
42.620008595	-73.70209545	National Grid	**352**	6518864103	95 TROY ROAD	E. GREENBUSH	RENSSELAER	Couse Corners	Shop
42.570456709	-73.68576792	National Grid	**354**	3351420108	1603 COLUMBIA TPKE	CASTLETON	RENSSELAER	Schodack	Shop
42.728585531	-73.68813466	National Grid	**356**	2173801102	127 CONGRESS ST	TROY	RENSSELAER	Congress St	Shop
43.086980325	-73.92122725	National Grid	**360**	7917654102	465 MIDDLE GROVE RD	MIDDLE GROVE	SARATOGA	Middle Grove	Shop
42.781629400	-73.69614922	National Grid	**363**	3603127003	30 SARATOGA AVE	WATERFORD	SARATOGA	South Waterford	Shop & Rental
42.910815791	-73.82207828	National Grid	**365**	4768811109	13 LONGKILL ROAD	BALLSTON LAKE	SARATOGA	Jonesville	Shop & Rental
42.903542727	-73.79654769	National Grid	**366**	1593813105	322 USHER'S RD	BALLSTON LAKE	SARATOGA	Ushers Road	Shop
42.784743072	-73.65449223	National Grid	**368**	7812604100	100 NORTHERN DRIVE	TROY	RENSSELAER	Oakwood	Shop
43.296967380	-73.68311943	National Grid	**374**	1263126004	221 CORINTH RD	QUEENSBURY	WARREN	West Glens Falls	Shop & Rental
42.631813251	-73.89914667	National Grid	**379**	755060005	1936 NEW SCOTLAND RD.	SLINGERLANDS	ALBANY	Slingerlands	Shop
43.312011492	-73.64969816	National Grid	**380**	4292620121	360 GLEN ST	GLENS FALLS	WARREN	Sherman Ave	Shop
42.757320067	-73.77563516	National Grid	**382**	4512327001	204 WADE RD. EXT	LATHAM	ALBANY	Wade Rd	shop
42.680472558	-74.41924443	National Grid	**384**	5397492040	2656 STATE ROUTE 7	COBLESKILL	SCHOHARIE	Cobleskill	shop
42.836796356	-73.73642358	National Grid	**385**	1384007104	183 GUIDEBOARD RD	WATERFORD	SARATOGA	Guideboard Road	Shop
42.682667195	-73.9034379	National Grid	**386**	4161067003	1 MILL HILL COURT	SLINGERLANDS	ALBANY	Mill Hill Court	Shop
43.246414741	-73.83320936	National Grid	**390**	5113822115	132 MAIN ST	CORINTH	SARATOGA	Maple St	Shop
43.274099475	-73.63915878	National Grid	**392**	3013147006	43 BLUEBIRD RD	SO GLENS FALLS	SARATOGA	Bluebird Rd	Shop
43.336753341	-73.6534057	National Grid	**396**	4627052004	402 BAY RD	QUEENSBURY	WARREN	Bay Rd	Shop & Rental
42.673547639	-73.75083192	National Grid	**397**	4863170016	351 NORTHERN BLVD	ALBANY	ALBANY	North Albany	Shop
42.724350054	-73.84085797	National Grid	**402**	6814892107	1710 CENTRAL AVE	ALBANY	ALBANY	Central Ave	Shop & Rental
43.055606586	-74.04861301	National Grid	**403**	7008811137	1841 NYS RT 29	GALWAY	SARATOGA	Alway	Shop
42.795671100	-73.94372688	National Grid	**405**	5862566126	1209 CHRISLER AVE	SCHENECTADY	SCHENECTADY	Chrisler Ave	Shop & Rental
42.743088542	-73.8374255	National Grid	**406**	5134888104	1024 WATERVLIET SHAKER RD	ALBANY	ALBANY	Colonie	Shop
42.819114809	-73.77441243	National Grid	**407**	2529013109	1543 CRESCENT RD	CLIFTON PARK	SARATOGA	Vischers Ferry Road	Shop
43.085196000	-73.784528	National Grid	**408**	3428817120	521 BROADWAY	SARATOGA SPRINGS	SARATOGA	City Center (Sunoco)	Shop
42.732302733	-73.71001493	National Grid	**409**	8383646104	924 19TH STREET	WATERVLIET	ALBANY	19th Street	Shop
42.844052327	-73.9479843	National Grid	**410**	4640133100	411 BALLSTON RD.	SCOTIA	SCHENECTADY	Glenville	Shop & Rental
42.817738497	-73.94069643	National Grid	**411**	9576461105	1033 ERIE BLVD	SCHENECTADY	SCHENECTADY	Erie Blvd	Shop & Rental
42.426316899	-73.68848294	National Grid	**412**	2298131005	2931 ROUTE 9	VALATIE	COLUMBIA	Valatie	Shop & Rental
42.650778636	-73.69657101	National Grid	**414**	7251409101	536 N. GREENBUSH ROAD	RENSSELAER	RENSSELAER	Defreestville	Shop
43.341446530	-73.68258884	National Grid	**415**	1888053004	1002 ROUTE 9	QUEENSBURY	WARREN	Queensbury	Shop & rental
43.244462380	-73.83158487	National Grid	**416**	5896434106	265 MAIN ST	CORINTH	SARATOGA	Palmer Ave	Shop & Rental
43.315222222	-73.61094722	National Grid	**417**	3085620009	777 QUAKER RD	QUEENSBURY	WARREN	Quaker Rd	Shop
42.797788907	-73.96525114	National Grid	**418**	1955247105	2009 BROADWAY	SCHENECTADY	SCHENECTADY	Broadview	Shop
43.054534259	-74.37702487	National Grid	**419**	1497024004	1594 ROUTE 29A	GLOVERSVILLE	FULTON	Meco	Shop
42.825119195	-73.70816944	National Grid	**420**	8589029110	280 MIDDLETOWN ROAD	WATERFORD	SARATOGA	The Point	Shop & Rental
43.237874407	-73.49122778	National Grid	**424**	2469038133	7 SHERIDAN ST	ARGYLE	WASHINGTON	Argyle	Shop
43.013680611	-74.36105824	National Grid	**425**	6173716139	201 NORTH COMRIE AVE.	JOHNSTOWN	FULTON	Briggs	Shop & Rental
43.979464341	-75.90628001	National Grid	**436**	2784309013	508 MILL ST	WATERTOWN	JEFFERSON	Mill St	Shop
43.124034747	-73.76715302	National Grid	**444**	2280132105	445 NORTHERN PINES RD	WILTON	SARATOGA	Davidson Dr	Shop
42.929613842	-74.20402057	National Grid	**445**	3497782003	1455 STATE HIGHWAY 5S	AMSTERDAM	MONTGOMERY	South Amsterdam	Shop
42.855689000	-73.777151	National Grid	**447**	9337967002	418 CLIFTON PARK CENTER ROAD	CLIFTON PARK	SARATOGA	Sitterly Rd	Shop
43.360688264	-73.39287145	National Grid	**448**	4919102135	8062 ROUTE 40	HARTFORD	WASHINGTON	Hartford	Shop & District Ofice
43.046066852	-73.85016411	National Grid	**449**	3180639000	448 GEYSER ROAD	BALLSTON SPA	SARATOGA	Rowland St	Shop
43.093368282	-73.77128362	National Grid	**486**	7880129114	33 MARION AVE	SARATOGA SPRINGS	SARATOGA	Mobil (Car Wash & Garage)	Operations
43.090027282	-73.8287862	National Grid	**Plant**	1605220103	461 CHURCH ST	SARATOGA SPRINGS	SARATOGA	Plant	Operations

EXHIBIT C

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John W. Dax

William F. McLaughlin*
**Also Admitted in Massachusetts & District of Columbia*

September 9, 2015

Via Email Thomas.Higgins@nationalgrid.com
and First Class Mail

Thomas V. Higgins CEM
Lead Technical Support Consultant
Technical Sales & Engineering Support - UNY
National Grid
300 Erie Blvd West
Syracuse, New York 13202

Re: Remote Net Metering – Mechanicville Hydroelectric Project/Stewart's Shops

Dear Mr. Higgins:

This is in response to your email of September 2, 2015 concerning my letter of May 21, 2015, on behalf Albany Engineering Corporation (AEC). My letter of May 21 described a remote net metering arrangement under which the Mechanicville Hydroelectric Station through its two independent interconnections would be the source of electricity to multiple Stewart's Shops locations at which high capacity electric vehicle charging stations would be installed. You have raised several questions concerning the eligibility of my client's plan for the remote net metering (RNM) program.

We need to clarify the arrangement of the Mechanicville Hydroelectric Station. The turbine/generator units referred to in your email are 40 Hz units and are not electrically interconnected to the National Grid system. Rather, the 40 Hz units transfer power mechanically through two independent 60 Hz generators (frequency converters) with attendant losses. There are two 34.5kV buses in the National Grid substation and each receives power from one of the two frequency converters in the Mechanicville Hydroelectric Station. Each 60 Hz generator connects through an independent transformer (GSU) and National Grid meter. Each 60 Hz generator is rated at 2,000 kW and therefore qualifies for the RNM program. Each meets the tests you recite from the Commission's January 9, 2015 order in the fifth paragraph of your email. Furthermore, AEC is prepared to take the necessary steps to create separate deeds for the parcels of land on which the two 60 Hz generators sit.

Your statement that you are uncertain how AEC could assume responsibility for the Stewart's Shops accounts is unclear. A face to face meeting may provide the occasion for you to explain any relevant tariff requirements. AEC will be happy to meet with National Grid personnel and Commission Staff to go over the facts and seek guidance.

Please advise how you would like to proceed in setting up a meeting with Commission Staff.

Very truly yours,

THE DAX LAW FIRM, P.C.

John W. Dax

JWD:cgw
cc: J. Besha (Via Email)

From: Higgins, Thomas V. <Thomas.Higgins@nationalgrid.com>
Sent: Wednesday, September 02, 2015 1:08 PM
To: jdax@daxlawfirm.com
Cc: Audunson, Janet M.; Kelly, Kevin G.; LaBrake-Jr, Neil F.; Pilawa, Michael F.
Subject: Mechanicsville Hydroelectric/Stewart's Shops

Dear Mr. Dax,

National Grid has the following preliminary concerns regarding the proposed application of remote net metering credits to the named Stewart's Shops using a portion of the Mechanicville Hydroelectric project as the host:

Per the Commission's December 15, 2014 order, each project, up to the 2 MW limit, must be separately metered and interconnected to the utility grid, each must be located on a separate site, and each must operate independently of others.

Assuming that each turbine generator unit (Units 1, 2, 3, 5 and 7) has a generator nameplate rating of 750 kW, two units separately interconnected would be less than the 2 MW limit. However, if there are five units interconnected to National Grid's electric system via two separately metered interconnection points, one of those interconnection points would be > 2 MW.

Each turbine generator project up to the 2 MW limit must be located on a separate parcel of land. AEC would need to be able to subdivide the land beneath the powerhouse in such a way that each 2 MW project, inclusive of all the components that allow for the grouped turbine/generator units to operate independently, is located on separately deeded parcels.

Lastly, each 2 MW project must be operationally separate. The Commission's Jan. 9, 2015 order clarified that "the operational separation qualification will be met by showing that each project can start up, shut down, and run independently from any other project." AEC would need to demonstrate that each turbine/generator unit or turbine/generator unit grouping with a generator nameplate rating that does not exceed 2 MW is in fact operationally separate. Given that the turbine/generator units are housed in a single common powerhouse, it is likely that the units share certain equipment. Such equipment could be GSUs, air compressors, battery sets, oil systems, station service, fire protection, security systems, etc. Determining operational independence of turbine/generator units in a common powerhouse is far more complex than determining operational independence of solar PV arrays. Although AEC may be able to provide additional supporting documentation, National Grid may ultimately need to seek Staff or Commission guidance. It is not clear that the Commission intended for a single hydro plant to be subdivided by its turbine/generator units for the purpose of remote net metering.

Additionally, it is not clear how AEC could assume responsibility for the Stewart's Shops' electric accounts in a manner that conforms with National Grid's electricity tariff.

Thank you.

Thomas V. Higgins CEM
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NY-National Grid Distributed Generation Website:
http://www.nationalgridus.com/niagaramohawk/home/energyeff/3_distributed.asp

NY PSC Standardized Interconnection Requirements (NYSIR):
NYS SIR Document

Electric System Bulletin 750-Specifications for Electrical Installation
ESB 750

Electric System Bulletin 756-Requirements for Parallel Generation
ESB 756