

Proposal for 650MW [Redacted] Wind Farm [Redacted] and [Redacted] Wind Farm [Redacted] in Combination with ([REDACTED])

1. CPPD Form (excel document)

2. Executive Summary of the Proposal (including the base proposal and any alternative proposals)

EDP Renewables North America LLC (“EDPR NA”) through its subsidiaries [Redacted]. This proposal and pricing constitutes a joint bid with the transmission project proposed by [Redacted]. Please see Confidential Attachment 2.1 [Redacted].

This proposal advances the clean energy goals of the Procuring States as laid out in the Clean Energy RFP (and Connecticut, Massachusetts, and Rhode Island statute) by bringing incremental clean energy online in New England at competitive prices. Beyond competitively meeting clean energy goals, the Project will provide significant economic value to the ratepayers of the Procuring States. As a zero-marginal-cost fuel resource, wind energy offers long term price stability in a market increasingly susceptible to natural gas volatility. Providing long term contracting opportunities for clean energy resources will diversify the generation portfolio of the Procuring States, and serve as a hedge against the inherent volatility of fossil fuel generation that normally sets Locational Marginal Pricing.

[Redacted] and [Redacted] will be located in Aroostook County, Maine which offers one of the best wind resources and locations in New England, but will require a transmission solution for clean energy projects to effectively serve the load centers of the region. The authorization provided by the Soliciting Parties in this clean energy RFP would enable the necessary A/C system upgrades being proposed in the [Redacted]. These cost-effective A/C upgrades would increase system reliability and allow the Project to offer the enclosed pricing using the existing transmission system. EDPR NA is well positioned to provide clean energy from Aroostook County given its strong community support in the area.

EDPR NA through its project subsidiaries is an industry leader in reliability, [Redacted] 4,600 MW of wind farms. All projects are managed 24/7 out of the remote operations control center in Houston, which is equipped with redundant voice and data communications and all the necessary applications required for continuous monitoring and control of the turbines and substation equipment. As the lead market participant, EDPR NA will operate its assets in coordination with ISO-NE to promote grid stability and reliability.

The Project will benefit from EDPR NA’s extensive development experience, and the financial backing of a well-capitalized parent company [REDACTED]. EDPR NA believes [Redacted] and [Redacted], combined with the [Redacted], to be among the most competitive strategies for meeting the policy goals of the procuring states and delivering incremental clean energy to New England.

With respect to confidentiality, we have provided both redacted and non-redacted versions of our proposals as requested. Please consider all information redacted on the CDs as confidential especially all information related to price, structure, financing, financial, turbine electrical models, and all energy output information.

3. OPERATIONAL PARAMETERS

3.1 Maintenance Outage Requirements – Specify partial and complete planned outage requirements in weeks or days. Also, list the number of months required for the cycle to repeat (e.g., list time interval of minor and major overhauls, and the duration of overhauls). (Not applicable for bids for Firm Qualified Clean Energy from a Large Scale Hydro Resource)

Substation maintenance will require a complete outage for 1-2 days annually and 2-3 days every 5 years for more extensive maintenance. Planned partial outages for individual wind turbine maintenance will be conducted every 6 months and will last less than 24 hours. Maintenance of individual turbines is performed one-by-one, so that most turbines at a site remain on line, and is schedule to the greatest extent possible during low wind periods.

3.2 Operating Constraints – Specify all the expected operating constraints and operational restrictions for the project (i.e., limits on the number of hours a unit may be operated per year or unit of time). (Not applicable for bids for Firm Qualified Clean Energy from a Large Scale Hydro Resource)

[Redacted]

3.3 Reliability – Describe how the proposal would provide enhanced electricity reliability within the States of Connecticut, Massachusetts and Rhode Island, including its impact on transmission constraints.

The addition of a long-term energy contract with a fixed price to the portfolio of the Soliciting Parties will offer cost certainty for a term beyond what may be offered by conventional fuel-based generation sources. As further described in the **[Redacted]**, transmission upgrades would improve the reliability of the entire ISO-NE system. Furthermore, EDPR NA will make commercially reasonable efforts to qualify the Project for the Forward Capacity Market to be available during market wide capacity events.

3.4 Moderation of System Peak Load – Describe how the proposal would contribute to moderating system peak load requirements. If the project is an intermittent resource, please provide the following information:

- i) Estimated average output for each summer period (June- September) from 1:00 - 6:00 pm
- ii) Estimated average output for each winter period (October-May) from 5:00 – 7:00 pm

The Project would contribute to moderating System Peak Load as a zero marginal cost resource with a winter peaking wind profile. A table of estimated average outputs for the Project during the identified periods is included below as Table 3.4. In addition, the Project will make commercially reasonable efforts to qualify in the ISO New England Forward Capacity Market.

Table 3.4		
	Output Period	Estimated Average Hourly Generation (MWh/h)
Summer Peak	June 1-6 pm	[Redacted]
	July 1-6 pm	[Redacted]
	August 1-6 pm	[Redacted]

	September 1-6 pm	[Redacted]
Winter Peak	October 5-7 pm	[Redacted]
	November 5-7 pm	[Redacted]
	December 5-7 pm	[Redacted]
	January 5-7 pm	[Redacted]
	February 5-7 pm	[Redacted]
	March 5-7 pm	[Redacted]
	April 5-7 pm	[Redacted]
	May 5-7 pm	[Redacted]

The peak off peak quantities in the bidder response form use the convention of 1PM-6PM during the June through September summer period and 5PM-7PM for all other months.

3.5 *Development Stage of Facility – Describe whether the project is in operation, in construction or in the development phase.*

- (a) If in operation, when did the project achieve initial operation and commercial operation?*
- (b) If in construction, when did construction commence and what are the projected dates for initial testing commercial operation.*
- (c) If the project is partly in one development stage and partly in another, please explain in detail the status of the project.*

If the proposed project is an expansion, repowering, environmental investment or other modification of an existing Facility, please describe the project in detail, the total cost and cost on a \$/kW basis specifying the existing project and the proposed expansion, repowering or other modification. Indicate any incremental or decremental capacity.

[Redacted] is in the development stage with all land rights secured and active queue positions with ISO-NE. Civil and electrical engineering, wildlife, environmental and other necessary studies for permitting, are in advanced stages. **[Redacted]**

[Redacted] is in the development stage with land lease negotiations on going and active queue positions with ISO-NE. Initial suitability studies have been performed and major study work necessary for permitting will commence in the Spring of 2016. **[Redacted]**

4. Energy Resource Plan

- *Provide a summary of all collected wind data for the proposed site. Identify when the data was collected and by whom.*
- *Indicate where the data was collected and its proximity to the proposed site. Include an identification of the location and height for the anemometers that were used to arrive at an assessment of the site generation capability.*
- *Provide (a) at least one year of hourly wind resource data, or (b) a wind resource assessment report from a qualified resource assessment firm or meteorologist, or (c) both. Include an analysis of the available wind data which addresses the relationship between wind conditions and electrical output. Provide a projection of net annual energy production, including projections of average net hourly energy production, based on the wind resource data (a 12 x 24 energy projection).*

- *Provide a site-adjusted power curve. Each curve should list the elevation, temperature and air density used.*
- *Identify the assumptions for losses in the calculation of projected annual energy production, including each element in the calculation of losses.*

Wind resource assessment reports from EDPR NA's Energy Assessment team are included as Confidential Attachments 4.1 A and 4.1 B to this proposal. **[Redacted]**

5. FINANCIAL/LEGAL

5.1 *Provide a description of the business entity structure of the bidder's organization from a financial and legal perspective, including any general and limited partners, officers, directors, managers, members and shareholders, involvement of any subsidiaries supporting the project, and the providers of equity and debt during project development. Provide an organization chart showing the relationship between the equity participants and an explanation of the relationships. For jointly owned facilities, identify all owners and their respective interests, and document the Bidder's right to submit a binding proposal.*

[Redacted] are wholly owned subsidiaries of EDPR NA, an experienced renewable energy company with over 4,600 operating MWs in its portfolio, making it the third largest renewable energy company in the United States by installed capacity. EDPR NA is itself a wholly owned subsidiary of EDP Renováveis, S.A., a Spanish company ("EDPR SA"). Approximately 22.5% of the issued share capital of EDPR SA is publicly traded (Euronext Lisbon: EDPR) and widely disbursed among investors. The remaining share capital of EDPR SA is owned by EDP-Energias de Portugal, S.A. (EDPSA), through EDPSA's Spanish branch, EDP – Energias de Portugal, Sociedad Anónima, Sucursal en España. EDPR SA is one of the world's largest renewable energy companies and has over 9 Gigawatts of operating renewable energy projects throughout 13 countries.

EDPSA is a diversified energy and utility company, headquartered in Portugal. EDPSA is structured as a company whose subsidiaries hold interests in electricity generation and distribution companies, gas supply and distribution companies, and a number of other energy and non-energy related business ventures. These corporate relationships are illustrated in an organizational chart in Confidential Attachment 5.1.

5.2 *For projects that include new facilities or capital investment, provide a description of the financing plan for the project, including construction and term financing. The financing plan should address the following:*

- i. *Who will finance the project and how it will be financed*
- ii. *The project's projected financial structure*
- iii. *Expected sources of debt and equity financing*
- iv. *Estimated construction costs*
- v. *The projected capital structure*
- vi. *Describe any agreements entered into with respect to equity ownership in the proposed project and any other financing arrangement.*

In addition, the financing plan should address the status of the above activities as well as the financing of development and permitting costs. All bidders are required to provide this information.

[Redacted]

5.3 *Provide documentation illustrating the experience of the project sponsor in securing financing for projects of similar size and technology. For each project previously financed provide the following information:*

- i. Project name and location*
- ii. Project type and size*
- iii. Date of construction and permanent financing*
- iv. Form of debt and equity financing*

[Redacted]

5.4 *For projects that include new facilities or capital investment, provide evidence that the bidder has the financial resources and financial strength to complete and operate the project as planned.*

[Redacted]

5.5 *Provide copies of the most recent audited financial statement or annual report for each bidder for each of the past three years; including affiliates of the bidder (if audited statements are not available, unaudited statements are to be provided). Also, provide the credit ratings from Standard & Poor's and Moody's (the senior unsecured long term debt rating or if not available, the corporate rating) of the bidder and any affiliates and partners.*

Links to EDPR's audited financial statements and financial reports can be found [here](#). EDPR NA's audited financial statements for 2014 are included as Confidential Attachment 5.5.

EDPR NA and EDPR are unrated by any of the major rating entities. EDPSA is considered investment grade by two of the three major rating entities with a Long Term Rating of Baa3 from Moody's and BBB- from Fitch. Standard & Poor's has rated EDP as BB+ with a positive outlook.

5.6 *The bidder should demonstrate its ability (and/or the ability of its credit support provider) to provide the required security, including its plan for doing so.*

[Redacted]

5.7 *Provide a description of any current or recent credit issues/credit rating downgrade events regarding the bidder or affiliate entities raised by rating agencies, banks, or accounting firms.*

[Redacted]

5.8 *Describe the role of the Federal Production Tax Credit or Investment Tax Credit (or other incentives) on the financing of the project.*

[Redacted]

5.9 *Bidders must disclose any pending (currently or in the past three years) or threatened litigation or disputes related to projects developed, owned or managed by Bidder or any of its affiliates in the United States, or related to any energy product sale agreement.*

[Redacted]

5.10 *What is the expected operating life of the proposed project?*

[Redacted]

5.11 *For projects that include new facilities or capital investment, has the bidder already obtained financing, or a commitment of financing, for the project? Is such financing or financing commitment contingent on obtaining a long term agreement, such as one that would be obtained if the bidder's proposal is accepted? If financing has not been obtained, explain how obtaining a long term agreement as proposed will help you in obtaining financing for the proposed project or in obtaining more favorable terms for the financing of the proposed project.*

[Redacted]

5.12 *State whether the bidder or its affiliates have executed agreements with respect to energy, RECs and/or capacity for the project (including any agreements that have been terminated) and provide information regarding the associated term and quantities, and whether bidder has been alleged to have defaulted under or breached any such agreement.*

[Redacted]

5.13 *Description of Bidder and all affiliated entities and joint ventures transacting business in the energy sector.*

[Redacted]

5.14 *Has Bidder, or any affiliate of Bidder, in the last five years, (a) consented to the appointment of, or was taken in possession by, a receiver, trustee, custodian or liquidator of a substantial part of its assets, (b) filed a bankruptcy petition in any bankruptcy court proceeding, (c) answered, consented or sought relief under any bankruptcy or similar law or failed to obtain a dismissal of an involuntary petition, (d) admitted in writing of its inability to pay its debts when due, (e) made a general assignment for the benefit of creditors, (f) was the subject of an involuntary proceeding seeking to adjudicate that Party bankrupt or insolvent, (g) sought reorganization, arrangement, adjustment, or composition of it or its debt under any law relating to bankruptcy, insolvency or reorganization or relief of debtors.*

[Redacted]

5.15 Briefly describe any known conflicts of interest between Bidder or an affiliate of Bidder and any Soliciting Party, or any affiliates of the foregoing.

[Redacted]

5.16 Describe any litigation, disputes, claims or complaints involving the Bidder or an affiliate of Bidder, against any Soliciting Party or any affiliate of any Soliciting Party.

[Redacted]

5.17 Describe any litigation, disputes, claims or complaints, or events of default or other failure to satisfy contract obligations, or failure to deliver products, involving Bidder or an affiliate of Bidder, and relating to the purchase or sale of energy, capacity or renewable energy certificates or products.

[Redacted]

5.18 Confirm that Bidder, and the directors, employees and agents of Bidder and any affiliate of Bidder are not currently under investigation by any governmental agency and have not in the last four years been convicted or found liable for any act prohibited by State or Federal law in any jurisdiction involving conspiracy, collusion or other impropriety with respect to bidding on any contract, or have been the subject of any debarment action (detail any exceptions).

[Redacted]

5.19 Identify all regulatory and other approvals needed by Bidder to execute a binding sale agreement.

[Redacted]

5.20 Describe how the project will conform to FERC's applicable regulatory requirements, including, but not limited to, FERC requirements relating to allocation of transmission capacity and open access, the justness and reasonableness of rates, the potential for undue preference or discrimination, and affiliate dealings, if any.

[Redacted]

6. SITING, INTERCONNECTION AND DELIVERABILITY

This section of the proposal addresses project location, siting, real property rights and interconnection issues. Bidders should ensure that the threshold criteria outlined in Section 2.2 of the RFP for generation and interconnection siting are verified in their responses.

6.1 Provide a site plan including a map of the site that clearly identifies the location of the Eligible Facility site and/or Transmission Project route, the assumed right-of-way width, the total acreage for Eligible Facilities, the anticipated interconnection point (or, if applicable, multiple points for a Transmission Project), and the relationship of the site to other local infrastructure, including

transmission facilities, roadways, and water sources. In addition to providing the required map, provide a site layout plan which illustrates the location of all major equipment and facilities on the site.

Site plan included? Yes No If not, please explain:

Please see Confidential Attachment 6.1.A for a site plan of **[Redacted]**, and Confidential Attachment 6.1.B for a site plan of **[Redacted]**.

6.2 Provide evidence (including applicable documentation) of the right to use the Eligible Facility site and/or Transmission Project route, including, for Eligible Facilities, and any rights of way needed for interconnection.

i. Does the project have a right to use the Eligible Facility site and/or Transmission Project route for the entire proposed term of the PPA or tariff (e.g., by virtue of ownership or land development rights obtained from the owner)?

ii.

Yes **[Redacted]** No **[Redacted]** does not currently have 100% land control for all wind farm facilities. See 6.2 ii for more information and plan

ii. If so, please detail the Bidder's rights to control the Eligible Facility site and/or Transmission Project route control.

[Redacted]

iii. Identify any real property rights (e.g., fee-owned parcels, rights-of-way, development rights or easements or leases) that are required for access to the Eligible Facility site and/or Transmission Project route or for interconnection. Describe the status of acquisition of real property rights, any options in place for the exercise of these rights and describe the plan for securing the necessary real property rights, including the proposed timeline. Include these plans and the timeline in the overall project timeline.

Please see 6.2.ii above.

6.3 Provide evidence that the Eligible Facility site and/or Transmission Project route is properly zoned or permitted. If the Eligible Facility site and/or Transmission Project route is not currently zoned or permitted properly, identify present and required zoning and/or land use designations and permits and provide a permitting plan and timeline to secure the necessary approvals.

Detail the zoning and permitting issues:

Permitting plan and timeline:

[Redacted] is located within the Expedited Wind Energy Permitting Area (EWEP) in Aroostook County, Maine. There is no local zoning. Please refer to Section 7 as well as Confidential Attachment 10A and 10B for permitting plans and timelines.

[Redacted] is largely located with the Expedited Wind Energy Permitting Area (EWEPA) in Aroostook County, Maine. **[Redacted]** Please refer to Section 7 as well as Confidential Attachment 10A and 10B for permitting plans and timelines.

6.4 *Provide a description of the area surrounding the Eligible Facility site and/or Transmission Project route, including a description of the local zoning, flood plain information, existing land use and setting (woodlands, grasslands, agriculture, other).*

The wind turbine area for **[Redacted]** and **[Redacted]** is located entirely on privately-owned land used for commercial timber production. The topography of the area is rolling to steep terrain with elevation ranges of 750-1,600 feet above sea level. Neither **[Redacted]** nor **[Redacted]** is anticipated to be located within an existing, historic, or future floodplain, and is currently designated NSFHA (No Special Flood Hazard Area) on the Federal Emergency Management Agency Community Status Book Report (<http://www.fema.gov/cis/ME.html>).

6.5 *For Eligible Facilities, describe and provide a map of the proposed interconnection that includes the path from the generation site to the ISO-New England Pool Transmission Facilities ("PTF"). Describe how the bidder plans to gain interconnection site control.*
Interconnection map included? Yes No If not, please explain.
Interconnection Site Control Plan:

Please see Confidential Attachment 6.5 for an overview map of the Project, associated infrastructure, and proposed Point of Interconnection.

[Redacted]

6.6 *Please describe the status of any planned interconnection to the grid. Has the bidder made a valid interconnection request to ISO-New England Inc. ("ISO-NE"), the applicable New England Transmission Owner, or any neighboring control areas? Describe the type of interconnection service requested, i.e., Capacity Network Resource Interconnection Service, Capacity Network Import Interconnection Service or Network Resource Interconnection Service or Network Import Service.*

[Redacted]

6.7 *Describe the Project's electrical system performance and its impact to the reliability of the New England Transmission system. For Transmission Projects provide a description of how the project would satisfy ISO-NE's I.3.9 requirements. Provide the status of any interconnection studies already underway with ISO-NE and/or the transmission owner. Provide a copy of any studies completed to date. Provide a copy of an interconnection agreement, if any, executed by the bidder with respect to the proposed project. If an interconnection agreement has not been executed, please provide the steps that need to be completed before an interconnection agreement can be executed and the associated timeline.*
Performance and its impact:

The Project is not anticipated to negatively impact the reliability of the New England transmission system. An interconnection agreement is anticipated to be executed within 90 days of delivery of a SIS report. Please refer to Section 6.6 for LGIA timeline.

6.8 Provide the electrical models of all energy resources supporting the proposed project in accordance with the filing requirements of the ISO-NE Tariff Schedule 22 and 23.

Electrical models attached: If none, please explain:

Please see Confidential Attachments 6.8A and 6.8B for a representative electrical model of the Project. **[Redacted]**

6.9 Provide a copy of an electrical one-line diagram showing the interconnection facilities and the relevant facilities of the transmission provider.

Electrical one-line diagram attached: If none, please explain:

Please see Confidential Attachments 6.9.A and 6.9.B for electrical one line diagrams of the interconnection facilities of **[Redacted]**.

6.10 Specify and describe the current or new interconnection facilities (lines, transformers, switching equipment, system control protection, etc.) that bidder owns or is intending to construct or have constructed in order to deliver the proposed energy.

[Redacted]

- 6.11 Incremental data requirements for Projects that include Transmission facilities;
1. IDV file(s) in PSSE v32 format modeling only the new/modified Transmission components of the project: If none, please explain.
 2. If the Bidder does not use PSSE, provide in text format necessary modeling data as follows:

Please see the proposal from the **[Redacted]** Transmission Project Sponsors for this additional information.

7. ENVIRONMENTAL ASSESSMENT, PERMIT ACQUISITION PLAN AND TIER 1 CERTIFICATION

This section addresses environmental and other regulatory issues associated with project siting, development and operations.

- 7.1 Provide a list of all the permits, licenses, and environmental assessments and/or environmental impact statements required. If a bidder has secured any permit or has applied for a permit, please identify in the response.
- i. Provide a list of all Federal, state and local permits, licenses, and environmental assessments and/or environmental impact statements required to construct and operate the project.

Applicable Permit	Responsible Agency	[Redacted] Status	[Redacted] Status
Maine Site Location of Development Permit	Maine Department of Environmental Protection	[Redacted]	[Redacted]
Maine Natural Resources Protection Act Permit	Maine Department of Environmental Protection	[Redacted]	[Redacted]
Freshwater Wetland Alteration Permit	Maine Department of Environmental Protection	[Redacted]	[Redacted]
Erosion and Sedimentation Control Law Permit	Maine Department of Environmental Protection	[Redacted]	[Redacted]
MEPDES General Construction Permit	Maine Department of Environmental Protection	[Redacted]	[Redacted]
401 Water Quality Certification	Maine Department of Environmental Protection	[Redacted]	[Redacted]
Section 404 Clean Water Act Permit	US Army Corp of Engineers	[Redacted]	[Redacted]
Form 7640-1 Determination of No Hazard on Notice of Proposed Construction	Federal Aviation Administration	[Redacted]	[Redacted]
Building Permit/Site Plan Review (O&M Building)	Land Use Planning Commission	[Redacted]	[Redacted]
Non-Residential Development Permit, including Supplement S2	Maine Land Use Planning Commission	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
Traffic Movement Permit	Maine Department of Transportation	[Redacted]	[Redacted]
Local Building and/or Shoreland Zoning and/or Road Use Permits	Bridgewater Building Permit, Ashland Building Permit	[Redacted]	[Redacted]

7.2 Provide the anticipated timeline for seeking and receiving the required permits, licenses, and environmental assessments and/or environmental impact statements. Include a project approval assessment which describes, in narrative form, each segment of the process, the required permit or approval, the status of the request or application and the basis for projection of success by the milestone date. All requirements should be included on the project schedule in Section 10.

[Redacted]

7.3 Provide a preliminary environmental assessment of the site and project, including both construction and operation, as applicable. In addition, the bidder should identify environmental impacts associated with the proposed project, any potential impediments to development, and its plan to mitigate such impacts or impediments. The analysis should address each of the major environmental areas presented below, as applicable to the proposed project:

- i. Impacts during site development*

- ii. *Transportation infrastructure*
- iii. *Air quality impacts*
- iv. *Access to water resources/water quality impacts*
- v. *Ecological and natural resources impacts*
- vi. *Land use impacts*
- vii. *Cultural resources*
- viii. *Previous site use (e.g., greenfield, brownfield, industrial, etc.)*
- ix. *Noise level impacts*
- x. *Aesthetic/visual impacts*
- xi. *Transmission infrastructure impacts*
- xii. *Fuel supply access, where applicable*
- xiii. *Interconnection facilities*

i) Impacts during site development

Only a fraction of the overall Project footprints will be impacted for use by the Project after construction. The Project will consist of wind turbine generators, meteorological towers, access roads, electrical collection systems, electrical substations, overhead generator lead line, Operations and Maintenance buildings, and associated support facilities. The turbines will be located along elevated features within the Project area.

ii) Transportation infrastructure

Project access roads will primarily consist of existing logging roads and skidder trails on actively timbered land. It is likely that vegetation removal will be required in areas that do not have existing travel corridors; however, roads and collection lines will be designed to limit tree clearing and other environmental impacts. At the conclusion of the construction phase, areas that have been cleared and do not contain permanent infrastructure will be reclaimed and re-vegetated with a native mix as required by project permits. Minor improvements to County and State roads leading to the Project area may be required for turbine component delivery.

iii) Air quality

The generation of electricity from the wind does not result in any air emissions. Like similar wind generation facilities, the Project is likely to indirectly improve air quality by displacing more polluting forms of energy generation. Source: http://www.awea.org/learnabout/publications/upload/Wind-Turbines-and-Health-Factsheet_WP11.pdf.

iv) Access to water resources/water quality

The Project will engage in clearing and grubbing activities for the installation of access roads, electrical collection system, and turbine locations. In order to limit impacts to water resources and ensure water quality, the Project will identify these resources and develop a soil and erosion control plan that will avoid and minimize potential impacts to the extent practicable. The Project will employ Best Management Practices and approved construction measures, such as silt fence installation and adequate mulching on exposed soil, to further limit potential impacts. The Project will work with the appropriate regulatory agencies to minimize these impacts.

v) Ecology

[Redacted] and **[Redacted]** are located within lands that were previously disturbed by forestry activities. However, baseline wildlife studies have been completed to assess potential impacts to sensitive habitats and species of concern. Impacts to wetlands and waterways will be avoided and minimized as turbines will be located on hilltops, and transmission poles will span the wetlands and vernal pools identified along the easement corridor where possible.

vi) Land use

The Project will be compatible with existing land uses in and around the Project area.

[Redacted] and **[Redacted]** are located on forested landscape that is subject to logging activities and other limited commercial activities such as mining.

vii) Cultural resources

Pre and post-contact archaeological studies, architectural studies, and Tribal consultation have been completed for a large portion of the **[Redacted]** project. The appropriate regulatory agencies are being consulted to determine the best method to avoid and minimize cultural impacts.

Cultural resource studies will commence for **[Redacted]** in 2016.

viii) Previous site use

Both **[Redacted]** and **[Redacted]** project areas are utilized for logging and limited commercial purposes.

ix) Noise level

[Redacted] has performed sound modeling for initial turbines and turbine locations, and was found to be within applicable noise limits. The remainder of the project will be designed with the same standards to comply with sound limits and new noise studies will be performed once the final wind turbine model has been selected.

[Redacted] will perform sound modeling standards once the wind turbine model has been selected.

x) Aesthetic/visual

The Project is located predominantly in remote forest land and will be designed to minimize the visual impact of the Project for seasonal residences.

The **[Redacted]** Wind Farm has completed a visual impact assessment and was found to have no impact on scenic locations as defined by the Maine Department of Environmental Protection. **[Redacted]** will refresh visual studies once a wind turbine model has been chosen.

[Redacted] Wind Farm will also undergo a thorough visual study however at this time it is not anticipated that any scenic locations as defined by the Maine Department of Environmental Protection will be adversely impacted.

xi) Transmission infrastructure

[Redacted]

xii) Fuel supply access

Not applicable.

xiii) Interconnection facilities

[REDACTED]

7.4 Provide documentation identifying the level of public support for the project including letters from public officials, newspaper articles, etc. Include information on specific localized support and/or opposition to the project of which the bidder is aware. Provide copies of any agreements with communities and other constituencies impacted by the project, and a plan for community outreach activities, and discuss the status of that plan.

EDPR has built strong public support in Aroostook County and Maine via an extensive community outreach program. This support was documented at a public meeting held by the Department of Environmental Protection October 22nd in Aroostook County where, of over 90 attendees, a majority were in support of the project.¹ A letter from the Governor of Maine's Energy Office regarding the **[Redacted]** Wind Farm is included in Confidential Attachment 7.4.

The Project will build upon the solid foundation of public support by continuing public outreach efforts and negotiating a Tax Increment Financing Agreement with the Aroostook County Commissioners and, where applicable, local townships to increase community benefits.

The Project's community outreach program involves direct participation with local organizations and events. This support includes community open houses, charitable giving, sponsorship of community events, educational and job training support, and active participation in local schools since 2014.

7.5 For bids that include Tier 1 Qualified Clean Energy, provide documentation demonstrating that the project was or will be qualified as a Tier 1 Class I renewable energy source under Conn. Gen. Stat. Section 16-1(20) as amended by Connecticut Public Act 13-303 M.G.L. c. 25A, § 11F, and 225 CMR 14.00; and/or R.I.G.L. § 39-26-1 and Rules and Regulations Governing the Implementation of a Renewable Energy Standard. If the facility is already in operation, please indicate when the facility received such qualification.

The Wind Facilities will provide Tier 1 Qualified Clean Energy in each of the procuring states because: (1) under Conn. Gen. Stats. Section 16-1(20)(A)(ii), they will produce "electricity derived... from wind power;" (2) under M.G.L. c 25A, §11F (b) (2), they will generate electricity "using... wind energy;" and (3) under 235 CMR 14.05(1)(a)(2), they will be "Generator Unit(s)' that "use[s]...wind energy."

¹ Meeting transcript available upon request.

The Wind Facilities will be newly constructed and will produce energy derived from wind power, thus qualifying as a Class I renewable resource pursuant to Conn Gen. Stats. 16-1(20) (revised to Jan. 1, 2015), as amended by P.A. 13-303 sec. 1, as a Class I renewable energy generating source pursuant to M.G.L. c. 25A, sec. 11F(b) and (c) and 225 CMR 14.05(1)(a)(2). These generation facilities also will serve the purpose of R.I.G.L. 39-26-1 because they will qualify as renewable energy resources pursuant to Sec. 39-26-2(9) and 39-26-5(a)(2) and Sec. 5.1(i)(b) and 5.1(ii) of the referenced Rules and Regulations.

7.6 Identify any existing, preliminary or pending claims or litigation, or matters before any federal agency or any state legislature or regulatory agency that might affect the feasibility of the project or the ability to obtain or retain the required permits for the project.

EDPR NA is not aware of any such claims, litigation, or matters.

8. ENGINEERING AND TECHNOLOGY; COMMERCIAL ACCESS TO EQUIPMENT

8.1 Provide a reasonable but preliminary engineering plan which includes the following information:

- i. Type of generation technology, if applicable*
- ii. Major equipment to be used*
- iii. Manufacturer of the equipment*
- iv. Status of acquisition of the equipment*
- v. Whether the bidder has a contract for the equipment. If not, describe the bidder's plan for securing equipment and the status of any pertinent commercial arrangements*
- vi. Equipment vendors selected/considered*
- vii. History of equipment operations*
- viii. If the equipment manufacturer has not yet been selected, identify in the equipment procurement strategy the factors under consideration for selecting the preferred equipment*

The wind turbines will be the major equipment procured for the Project. Based on past experience, including standard industry lead times, the solicitation of proposals for wind turbines will occur approximately 18 months prior to the targeted start of construction date.

EDPR NA will select a turbine supplier using a competitive solicitation process that will provide the most competitive levelized cost of energy. The factors that will be evaluated in this solicitation process are: cost of energy, long term reliability, availability metrics, track record, installed base, operation and maintenance (service) terms and conditions. That solicitation will include many of the major turbine suppliers such as Acciona, Gamesa, Vestas, and others. The supplier agreements will be finalized during the later stages of the development period.

Assuming an award and execution of a PPA under the RFP, the Bidders will start the wind turbine procurement process for its Project at an appropriate point in the siting and permitting process. Section 10 of this Proposal includes additional information about the procurement schedule for the Wind Facilities.

8.2 If the bidder has not yet selected the major generation equipment for a project, please provide a list of the key equipment suppliers under consideration.

[Redacted]

8.3 Please identify the same or similar equipment by the same manufacturer that are presently in commercial operation including the number installed, installed capacity and estimated generation for the past three years.

EDPR NA has installed turbines from all of the above listed manufacturers at its other projects in the United States.

[Redacted]

8.4 For less mature technologies, provide evidence (including identifying specific applications) that the technology to be employed for energy production is ready for transfer to the design and construction phases. Also, address how the status of the technology is being considered in the financial plan for the project.

All of the technology proposed for the Project has a reliable operational history. As described in Section 8.3, all equipment will be manufactured by industry leaders.

8.5 Please indicate if the bidder has secured its equipment for the project. If not, identify the long-lead equipment options and describe the timing for securing equipment.

EDPR NA has strong relationships with leading wind turbine suppliers and has purchased more than 6000MWs globally. At this time, no project-specific binding contracts are in place. A competitive RFP will be sent out to potential suppliers to obtain commercial and technical offers for materials and services.

For a Project this size, EDPR NA has procured turbines at a lead time of approximately 9 months.

9. OPERATION AND MAINTENANCE

9.1 Provide an O&M plan for the project that demonstrates the long term operational viability of the proposed project. The plan should include a discussion of the staffing levels proposed for the project, the expected role of the project sponsor or outside contractor, scheduling of major maintenance activity, and the plan for testing equipment.

[Redacted]

Maintenance Duties

The O&M field duties involve performing all scheduled and unscheduled maintenance including periodic operational checks and tests, regular preventive maintenance on all turbines, related plant facilities, equipment, safety systems, controls, instruments and machinery. Specific tasks include:

- Maintain the wind turbines and the mechanical, electrical power, and communications system
- Perform all routine inspections
- Maintain all oil levels and change oil filters

- Maintain control systems, Project structures, access roads, drainage systems and other facilities necessary for Project operation Maintain all O&M field maintenance manuals, service bulletins, revisions, and documentation for the Project
- Maintain all parts, price lists, and computer software
- Maintain and operate interconnection facilities
- Provide all labor, services, consumables, and parts required to perform scheduled and unscheduled maintenance on the wind farm, including repairs and replacement of parts and removal of failed parts
- Cooperate with avian and other wildlife studies as may be required to include reporting and monitoring
- Manage lubricants, solvents, and other hazardous materials as required by local and/or state regulations
- Maintain appropriate levels of spare parts in order to maintain equipment
- Provide all necessary equipment including industrial cranes for removal and reinstallation of turbines
- Hire, train, and supervise a work force necessary to meet the general maintenance requirements
- Implement appropriate security measures

[Redacted]

Due to the confidential nature of the turbine procurement process, Bidder is unable to provide copies of any executed Operations, Maintenance or other Project related services contracts or agreements.

9.2 Describe in detail the proposed O&M funding mechanism and funding levels to support planned and unplanned O&M requirements.

Our O&M and asset management efforts are an ongoing budgeted expense, and the incremental cost of managing the Project was considered in the bid prices. EDPR NA is an industry leader in reliability: with over 2,000 turbines in operation and drawing on approximately 40 million hours of wind turbine operational history **[Redacted]**. Drawing on this successful experience, EDPR NA is able to accurately forecast the required spending for O&M.

9.3 Describe the terms (or expected terms) of the warranties and/or guarantees on major equipment that the bidder is utilizing or proposing to utilize.

[Redacted]

9.4 Describe the status of the project sponsor in securing any O&M agreements or contracts. Include a discussion of the sponsor's plan for securing a medium-term or long-term O&M contract, including the expected provider of O&M services.

[Redacted]

9.5 Provide examples of the bidder's experience with O&M services for other similar projects.

Operations

[Redacted]

O&M Staffing

[Redacted]

Asset Management

EDPR is consistently achieving above-market NCFs and operational metrics in all geographies within which it operates. [Redacted] This is the result of high performing and experienced teams that have developed solid processes to optimize performance. Beyond availability, EDPR's technical teams also closely track other metrics such as efficiency, reactive power and scheduling deviations. Operational excellence is at the core of EDPR, and all technical areas of the company are continuously improving operations with one clear objective: optimizing performance throughout the project life-cycle.

10. PROJECT SCHEDULE

For Eligible Facilities or Transmission Projects that are not yet in-service, bidders are required to provide a complete critical path schedule for the project from the notice of selection of the project for contract consideration to the start of commercial operations. For each project element, list the start and end date.

Please see Confidential Attachment 10A and 10B for the Project Schedule

10.1 *Identify the elements on the critical path. The schedule should include, at a minimum, facility contracts, start of construction, construction schedule, siting, fuel supply, financing, engineering and procurement, acquisition of real property rights, Federal, state and/or local permits, licenses, environmental assessments and/or environmental impact statements (including anticipated permit submittal and approval dates) and any other requirements that could influence the project schedule and the commercial operation date, including requirements pertaining to the generator interconnection process and any transmission facilities for which the bidder seeks recovery through federal transmission rates.*

Please see Confidential Attachment 10A and 10B for the Project Schedule

10.2 *Detail the status of all critical path items.*

Please see Confidential Attachment 10A and 10B for the Project Schedule

11. PROJECT MANAGEMENT/EXPERIENCE

Bidders are required to demonstrate project experience and management capability to successfully develop (for a project that includes new facilities or capital investment) and operate the project proposed. The Soliciting Parties are particularly interested in project teams that have demonstrated success in projects of similar type, size and technology and, for projects that include new facilities or capital investment, can demonstrate an ability to work together effectively to bring the project to commercial operation in a timely fashion.

11.1 Provide an organizational chart for the project that lists the project participants and identifies the corporate structure, including general and limited partners.

Confidential Attachment 5.1 to this proposal provides a corporate structure chart. Confidential Attachment 11.4 provides a management chart that identifies the Project participants and their biographies.

11.2 For a project that includes new facilities or capital investment, provide statements that list the specific experience of the bidder and each of the project participants (including, when applicable, the bidder, partners, EPC contractor and proposed contractors), in developing, financing, owning, and operating generating or transmission facilities (as applicable), other projects of similar type, size and technology, and any evidence that the project participants have worked jointly on other projects.

EDPR NA (www.edpr.com and <http://www.edprnorthamerica.com/>) develops, constructs, owns, and operates wind and solar renewable energy projects throughout the United States. EDPR NA's rigorous approach has led to the successful development of more than 4,600 MW of renewable energy facilities, and the company has demonstrated a proven ability to successfully navigate complicated land, interconnection and permitting environments in order to achieve commercial operations for its projects.

EDPR NA's 4,600 MW of operational assets are spread across 12 U.S. states and one Canadian province at 34 wind farms and 2 solar parks, making EDPR NA the 3rd largest owner of wind energy in the United States. EDPR NA is currently constructing four additional wind farms representing 600 MW of additional capacity, and is actively developing a portfolio of more than 10,000 MW of additional renewable energy assets in over fifteen states.

EDPR NA is based in Houston, Texas, with over 300 employees and regional offices in Maine, New York, Oregon, Illinois, Indiana, Kansas and Massachusetts. **[Redacted]** With more than 300 employees EDPR NA's highly qualified team has a proven capacity to execute projects and achieve goals.

EDPR NA is owned by EDPR SA, a global leader in the renewable energy sector that designs, develops, constructs and operates renewable generation facilities. With a sound development pipeline, first class assets and market-leading operating capacity, EDPR SA has undergone exceptional development in recent years.

Headquartered in Madrid, Spain, EDPR SA believes that its long-term growth will be driven by favorable renewable energy market conditions, both globally and in the countries in which it operates. In addition, EDPR NA will continue to benefit from positive trends in the global renewable energy industry, including the economic efficiency and acceleration of technological developments in renewable energy that make renewable energy generation increasingly reliable and competitive.

With more than 9 GW of installed wind capacity as of Q4 2015, EDPR SA is ranked fourth in the world in wind energy based on net installed capacity and is consistently ranked in the top three in terms of sectoral growth.

11.3 For a bid that includes existing facilities, provide statements that list the specific experience of the bidder and each of the project participants (including, when applicable, the bidder, partners, EPC contractor and proposed contractors), in owning and operating generating or transmission

facilities (as applicable), other projects of similar type, size and technology, and any evidence that the project participants have worked jointly on other projects.

This bid does not pertain to existing facilities.

11.4 *Provide a management chart that lists the key personnel dedicated to this project and provide resumes of the key personnel. For Eligible Facilities or Transmission Projects that are not yet in-service, key personnel of the bidder's development team having substantial project management responsibilities must have:*

- i. Successfully developed and/or operated one or more projects of similar size or complexity or requiring similar skill sets; AND*
- ii. For a project that includes new facilities or capital investment, experience in financing one or more projects of a similar size and complexity (or have the financial means to finance the project on the bidder's balance sheet).*

[Redacted]

11.5 *Provide a listing of all projects the project sponsor has successfully developed or that are currently under construction. Provide the following information as part of the response:*

- i. Name of the project*
- ii. Location of the project*
- iii. Project type, size and technology*
- iv. Commercial operation date*
- v. Estimated and actual capacity factor of the project for the past three years*
- vi. Availability factor of the project for the past three years*
- vii. References, including the names and current addresses and telephone numbers of individuals to contact for each reference.*

In the past two years, EDPR NA has completed eight renewable energy projects totaling 558 MW, including its first two solar projects (Lone Valley I & II), and also managed the construction and operation of the company's first Canadian project (South Branch), which is owned by EDPR SA.

[Redacted] EDPR NA can provide, on a confidential basis, additional information regarding those projects upon the request of the Soliciting Parties.

EDPR NA also has a number of projects currently under construction or that are planned to be built in the next two years. **[Redacted]**

11.6 *With regard to the bidder's project team, identify and describe the entity responsible for the following, as applicable:*

- i. Construction Period Lender, if any*
- ii. Operating Period Lender and/or Tax Equity Provider, as applicable*
- iii. Financial Advisor*
- iv. Environmental Consultant*
- v. Facility Operator and Manager*
- vi. Owner's Engineer*
- vii. EPC Contractor (if selected)*

- viii. *Transmission Consultant*
- ix. *Legal Counsel*

Construction Period Lender

[Redacted]

Operating Period Lender and/or Tax Equity Provider

EDPR NA intends to use its proven corporate level approach to its existing infrastructure portfolio to fund the operating period. It is possible that external financing may be considered for components of the Project, but that would be an option driven by the benefits of accessing that market, not necessity. Similarly, a tax equity investor may be sought for one or more of the Wind Facilities at an appropriate time, in which case EDPR NA has existing relations with several investors that can perform that role; however, like operating period financing, the future development and construction of the Wind Facilities is not dependent on tax equity participation.

Financial Advisor

EDPR NA does not anticipate retaining a dedicated financial advisor for the development of this Project, and has internal finance personnel experienced with this type of transaction. Further detail on the individuals responsible for financial advice can be found in the biographies in Confidential Attachment 11.4.

Environmental Consultant

EDPR NA's internal Environmental team will be responsible for a majority of the Project's environmental tasks. Further information on the responsible individual can be found in Confidential Attachment 11.4. EDPR NA will supplement this team by hiring contractors as necessary for wildlife and other studies.

Facility Operator and Manager

[Redacted]

Owner's Engineer

EDPR NA's internal transmission department will be responsible for the transmission and interconnection portions of this bid, and does not anticipate the use of external consultants. Further detail on the individuals responsible for Project Engineering can be found in the biographies in Confidential Attachment 11.4.

EPC Contractor

EDPR NA will function as the EPC contractor for the Wind Facility. EDPR NA has experienced in-house project management, construction, and engineering staff, and as construction approaches, each will hire lead construction and electrical contractors. EDPR NA typically works with such nationally recognized firms as Blattner & Sons, Mortensen, and Wanzek.

Transmission Consultant

EDPR NA's internal transmission engineering and construction departments will be responsible for the generator lead line and interconnection portions of this bid in addition to the use of external consultants.

Legal Counsel

The in-house legal department of EDPR NA will have primarily responsibility for the legal support of the Project. Those lawyers are familiar with corporate policies and positions and have supported numerous, similar renewable energy projects in recent years. The legal department will access and manage outside counsel if and as necessary to obtain assistance, including for matters of local law such as siting and permitting.

11.7 Provide details of bidder's experience in ISO-NE Markets. With regard to bidder's experience with ISO-NE markets, please indicate the entity that will assume the duties of Lead Market Participant for your Project. Please provide a summary of the proposed Lead Market Participant's experience with each of the ISO-NE markets.

[Redacted]

12. Emissions

12.1 For existing generation facilities, provide emissions estimates based on available continuous emissions monitoring data. Where continuous emissions monitoring data is not available, provide emissions estimates based on the most recent stack emissions test conducted using an EPA reference method approved by the applicable permitting and enforcement authority. Where continuous emissions data or actual stack emissions test data are not available, provide emissions estimates based on emissions factors from the latest edition of EPA's AP-42, Compilation of Air Pollutant Emissions Factors.

For new generation facilities, provide emissions estimates based on available data from the unit manufacturer. Alternatively, provide actual emissions data determined in accordance with the paragraph above for a similar facility built within the past 3 years. Include copies of supporting documentation for all emissions estimates.

Project Anticipated Emissions, expressed in pounds/megawatt-hour (lbs./MWh)

Source of Information	Date of Test (if applicable)	Greenhouse Gases(all except methane) Expressed as Carbon Dioxide equivalent (CO ₂ e)	Nitrogen Oxides (NO _x)	Sulfur Oxides (SO _x)	Carbon Monoxide (CO)	Particulate Matter (PM 2.5)	Methane (CH ₄)
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

The Wind Energy proposed in this bid is a zero-emissions resource.

12.2 Describe any past investments that will, or have been made to your facility to improve its emissions profile or any planned future investments made to your facility in order to improve its emissions profile. Pollutant specific emissions improving technologies include, but are not limited to:

- *NOx – Selective/Non-Selective Catalytic Reduction*
- *SOx – wet/dry scrubbers*
- *PM – fabric filter/bag house, electrostatic precipitator, cyclone separator*
- *CO – oxidation catalyst*

Investments that improve overall emissions include, but are not limited to:

- *equipment tune-ups (improves combustion efficiency and emissions)*
- *boiler tube replacements (improves heat transfer efficiency and reduces fuel use)*
- *other efficiency improvements (e.g., installing a heat exchanger to use waste heat to pre-heat feed water to the boiler)*

Include control equipment specifications, date(s) of installation, expected life of equipment, benefits gained from the addition of such equipment, etc.

[Redacted]

12.3 *Describe how your project will contribute to (i) Connecticut's goals under Connecticut Public Act 08-98, An Act Concerning Connecticut Global Warming Solutions (2008), codified in Section 22a-200a of the Connecticut General Statutes; (ii) the Massachusetts 2008 Global Warming Solutions Act (GWSA) and the 2010 Clean Energy and Climate Plan for 2020. Describe how your project will contribute both to the short term 2020 goal, and longer term 2050 goal found in these laws. And (iii) Rhode Island's purposes under Chapter 39-31*

This proposal advances the clean energy goals of the Procuring States as laid out in the Clean Energy RFP (and Connecticut, Massachusetts, and Rhode Island statute) by bringing incremental clean energy online in New England at competitive prices. The addition of this Project to the energy mix in the ISO-NE electric market will be a major step toward the goals of reducing greenhouse emissions below 1990 levels by 2020, and significantly below 1990 levels by 2050.

The generation of electricity from the wind does not result in any air emissions. The Project is likely to indirectly improve air quality by displacing more polluting forms of energy generation. Source: http://www.awea.org/learnabout/publications/upload/Wind-Turbines-and-Health-Factsheet_WP11.pdf.

The Project represents the kind of coordinated, cost-effective, and strategic investment that is contemplated in the Procuring States' clean energy goals. Please see section 13.3 for a discussion of the economic benefits associated with the Project.

13. EMPLOYMENT/ECONOMIC DEVELOPMENT/OTHER DIRECT AND INDIRECT BENEFITS

13.1 *Please provide an estimate of the number of jobs to be created directly during project development and construction (for a project that includes new facilities or capital investment), and during operations, and a general description of the types of jobs created, estimated annual compensation, the employer(s) for such jobs, and the location. Please treat the development, construction, and operation periods separately in your response.*

Project development and construction, using the National Renewable Energy Laboratory's Jobs and Economic Development Impact (JEDI) model, is expected to create 283 construction and interconnection labor direct full-time equivalent jobs, and 47 for construction related services for on-site labor. Project operations are anticipated to require 29 full-time equivalent jobs for on-site labor. Construction labor

would consist of foundation, erection, electrical, and management. Operations and Maintenance Labor would consist of Field Technicians, Administration, and Management. A full breakout of the anticipated jobs and economic impacts is included in the table below.

Local Economic Impacts - Summary Results			
	Jobs	*Earnings	*Output
During construction period			
Construction and Interconnection Labor	283	\$13.10	
Construction Related Services	47	\$3.30	
Turbine and Supply Chain Impacts	1638	\$81.63	\$244.41
Induced Impacts	779	\$36.63	\$104.49
Total Impacts	2747	\$134.73	\$368.50
During operating years (annual)			
Onsite Labor Impacts	29	\$1.44	\$1.44
Local Revenue and Supply Chain Impacts	41	\$2.10	\$16.66
Induced Impacts	56	\$2.79	\$7.96
Total Impacts	127	\$6.33	\$26.07
<i>*Earnings and output figures represents millions in 2016 dollars</i>			

13.2 Please provide the same information as provided in response to question 13.1 above but with respect to jobs that would be indirectly created as a result of the proposed project.

The Project’s estimated indirect impacts using the JEDI model during the development and construction period include 1,638 full time equivalent jobs in Turbine and Supply Chain Impacts and 779 induced jobs. During the operating period, 41 full time equivalent jobs would be created due to Local Revenue and Supply Chain Impacts, and 56 would be created due to induced impacts.

13.3 Please describe any other economic development impacts (either positive or negative) that could result from the proposed project, such as creating property tax revenues or purchasing capital equipment, materials or services for New England businesses. Please provide the location(s) where these economic development benefits are expected to occur.

Providing long term contracting opportunities for renewables that are operating outside of Connecticut and Massachusetts still provides economic benefits for those States in the form of lower prices for clean renewable energy. This wind farm will bring economic value to the ratepayers of Connecticut and Massachusetts as a competitively priced, long-term hedge against volatility in electric power prices. As a zero-marginal-cost resource wind power ballasts a generation portfolio against fuel price variability.

13.4 To the extent not already specified elsewhere in your response, please address the factors listed in Section 2.3.2.1 and describe any benefits or impacts associated with the proposed project.

[REDACTED]

14. ADDITIONAL INFORMATION REQUIRED FOR TRANSMISSION PROJECTS

[Redacted]

15. EXCEPTIONS TO FORM PPA

[Redacted]