

# STATE OF NEW HAMPSHIRE

## Intra-Department Communication

**DATE:** July 14, 2010

**AT (OFFICE):** NHPUC

**FROM:** Maureen L. Reno *MLR*  
Utility Analyst III

**SUBJECT:** Staff Recommendation Re: DE 10-156, Conservation Services Group Certification Application of the Princeton Crossing L.P. facilities for Class II Eligibility and Request for Aggregation Pursuant to RSA 362-F

**TO:** Chairman Thomas B. Getz  
Commissioner Clifton C. Below  
Commissioner Amy L. Ignatius  
Debra A. Howland, Executive Director

**CC:** Jack K. Ruderman, Director, Sustainable Energy Division  
Suzanne Amidon, Staff Attorney



### *Summary*

On June 2, 2010, Conservation Services Group (CSG) submitted an application on behalf of Princeton Crossing L.P. (Princeton Crossing) requesting that the Commission grant approval of its 17 photovoltaic facilities located in Massachusetts to produce Class II Renewable Energy Certificates (RECs) pursuant to RSA 362-F, New Hampshire's Electric Renewable Portfolio Standard law. Pursuant to RSA 362-F:4, II, Class II eligibility requires that a facility produce electricity from solar technologies and that it began operation after January 1, 2006.

CSG also requested that the Commission grant CSG aggregator status for the 17 facilities referred to as Princeton Properties Solar Aggregation (Princeton Aggregation). If the Commission approved this request, the New England Power Pool Generation Information System (NEPOOL GIS) would recognize the eligible facilities as a single generator and issue RECs for this aggregation's total monthly output. Because the aggregation of multiple customer-sited renewable energy sources is permitted by the NEPOOL GIS, and because New Hampshire's RPS uses the NEPOOL GIS system pursuant to RSA 362-F:6 I, Staff recommends the Commission grant CSG's request.

Pursuant to RSA 362-F, the Commission, in a non-adjudicative process, is required to issue a determination of whether a facility meets a particular classification

within 45 days of receipt of a completed application. The CSG application was completed on June 24, 2010.<sup>1</sup> The Massachusetts facilities are customer-sited photovoltaic rooftop arrays that began operation in February 2010. The facilities meet the Class II eligibility requirements under RSA 362-F:4, II. Based on its review of the application, Staff recommends that the Commission approve the facilities included in the Princeton Aggregation as eligible for Class II RECs effective June 24, 2010.

***Analysis***

Each facility’s gross nameplate capacity ranges from 3.84 kilowatts (kW) to 31.00 kW. The details for each facility are listed in the following table.

<b>Facility Location</b>	<b>Total kW listed in application (DC Arrays)</b>
1 Heritage Drive, Salem, MA	18.00
2 Heritage Drive, Salem, MA	11.00
3 Heritage Drive, Salem, MA	11.00
4 Heritage Drive, Salem, MA	18.00
5 Heritage Drive, Salem, MA	18.00
6 Heritage Drive, Salem, MA	3.84
7 Heritage Drive, Salem, MA	30.00
8 Heritage Drive, Salem, MA	26.00
9 Heritage Drive, Salem, MA	20.00
10 Heritage Drive, Salem, MA	31.00
11 Heritage Drive, Salem, MA	31.00
12 Heritage Drive, Salem, MA	3.84
14 Heritage Drive, Salem, MA	31.00
15 Heritage Drive, Salem, MA	24.00
16 Heritage Drive, Salem, MA	31.00
17 Heritage Drive, Salem, MA	14.00
17a Heritage Drive, Salem, MA	3.84

Pursuant to the N. H. Code of Administrative Rules Puc 2505.08, the applicant is required to submit a complete list of the equipment used at the facilities and certain information regarding the installer, seller and independent monitor. The applicant provided a list of the inverter and solar panels installed at each facility by GroSolar. Since the facilities are customer-sited sources, their output is not recorded in the NEPOOL Market Settlement System and, as a result, their output must be monitored, verified and entered into the NEPOOL GIS by an independent monitor pursuant to Puc 2505. The application states and Staff verified that the facilities’ daily electricity generation is monitored by PowerDash, LLC (PowerDash).<sup>2</sup>

<sup>1</sup> On June 10, 2010, Staff issued a deficiency letter requesting additional information that the applicant provided on June 24, 2010.

<sup>2</sup> In October 2009, the Massachusetts Department of Energy Resources approved PowerDash as an independent third party meter reader pursuant to the NEPOOL GIS Operating Rule 2.5 (j).

The applicant is also required to provide a copy of the interconnection agreement, proof that the applicant's distribution utility approved the installation, and a signed attestation that the facility meets applicable building codes. The applicant submitted a copy of the interconnection agreement between Princeton Crossing and Massachusetts Electric Company that became effective January 15, 2010. The applicant also provided a signed attestation by Kurt Shillington, Operations Manager, of Princeton Crossing, stating that the facilities were installed and are operating in conformance with applicable building codes. Staff recommends that the Commission find that the signed attestation and the interconnection agreement meet Puc 2505.08 (b) (7) and (8).

Staff also supports CSG's request for aggregation of the above-named photovoltaic facilities because the aggregation complies with the NEPOOL GIS Operation Rules. Pursuant to the NEPOOL GIS Operating Rules 2.1 (a) (vi) and (c), multiple facilities represented by the same Non-NEPOOL generator representative may elect to be treated as a single GIS generator provided: 1.) the aggregation has a total nameplate capacity of less than five megawatts; 2.) all the facilities generate electricity from the same type of source; and 3.) the facilities are located in the same state. CSG has applied for and received a GIS facility code for the Princeton Properties Aggregation. This aggregation code, NON 32919, will allow PowerDash to report the total monthly aggregate output of the facilities in lieu of reporting output for each facility.

CSG's aggregation would also decrease the loss in revenues due to fractional RECs, reduce transactions costs and simplify reporting. Since the NEPOOL GIS requires non-NEPOOL generators to report meter data for whole megawatt-hours, CSG would lose some revenue when PowerDash reports generation for individual facilities.<sup>3</sup> If the Commission were to approve CSG's request, PowerDash would report total megawatt-hour output for the whole aggregation each month, thereby reducing the amount of lost kilowatt-hours. Aggregating the facilities would also reduce the transactions costs of trading RECs because CSG would only have to negotiate the terms of sale of RECs from the whole aggregation in lieu of contracts for each individual facility. Finally, PowerDash would save time reporting to the NEPOOL GIS only the output of the total aggregation.

### ***Recommendation***

Staff has reviewed CSG's application for photovoltaic facilities located on the above-named customer-sited rooftops and can affirm they are complete pursuant to Puc 2505.08. Staff recommends that the Commission grant CSG's request to be named as the aggregator of the Princeton Properties Aggregation and that this aggregation be eligible to receive Class II RECs effective June 24, 2010.

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<sup>3</sup> See *NEPOOL GIS Operating Rule 2.1 (c)*.