

# STATE OF NEW HAMPSHIRE

## Intra-Department Communication

DATE: December 07, 2012

AT (OFFICE): NHPUC

FROM: Barbara Bernstein   
Sustainable Energy Analyst

SUBJECT: DE 12-313, Vermont Public Power Supply Authority's Request to be  
Certified as an Independent Monitor Pursuant to Puc 2502.09  
**Staff Recommends Approval**

TO: Chairman Amy L. Ignatius  
Commissioner Robert R. Scott  
Commissioner Michael Harrington  
Debra A. Howland, Executive Director and Secretary

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



### *Summary*

On October 25, 2012, the Vermont Public Power Supply Authority (VPPSA) submitted an application requesting the Commission grant this entity independent monitor status pursuant to the New Hampshire Code of Administrative Rules Puc 2505.09. As an independent monitor, VPPSA would provide monitoring services for customer-sited sources within its service territory qualifying for renewable energy certificates (RECs).<sup>1</sup>

Staff recommends the Commission grant this request for VPPSA to be an independent monitor for customer-sited sources within its service territory that qualify for New Hampshire RECs.

### *Analysis*

Puc 2505.09 (b) states that an independent monitor shall be a licensed electrician or engineer in New Hampshire; a certified building analyst; a certified energy manager; a Residential Energy Services Network (RESNET) home energy rater; or, a certified independent monitor under another state's renewable portfolio standard program. According to the application, VPPSA qualifies as an independent monitor pursuant to Puc 2505.09 (c) because this entity is certified as a third-party monitor under the Massachusetts and Maine renewable portfolio standard programs. Currently the only Massachusetts qualified units VPPSA monitors are wind operations, however VPPSA is

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<sup>1</sup> Pursuant to Puc 2505.09(b).

qualified to read meters of any generation technology. Additionally, VPPSA currently monitors a hydroelectric facility, Highgate Falls Unit #5 (DE 12-314) through the Maine Renewable Portfolio Standard.

Puc 2505.09 (h) requires an independent monitor to conduct the following tasks:

1. Perform initial inspection of the source’s meter for accuracy and capability to measure the power produced (unless owned by a distribution utility that has already inspected it);
2. Measure the source’s annual electricity production or displacement;
3. Report the annual production or displacement of electricity by January 31<sup>st</sup> for the preceding calendar year; and,
4. Inspect customer-sited sources to demonstrate they are installed and operating in conformance with applicable safety, zoning and building codes and that the interconnection meets Puc 900 requirements. (See Puc 2507.04(h)).

Puc 2505.09 forbids VPPSA from using an employee to verify sources that are owned by members of the immediate family. VPPSA will also be restricted from selling or installing the equipment used by the source. The RPS rules also prohibit VPPSA from receiving compensation that is a function of the number of RECs issued to any source. The VPPSA application indicates that the entity does not plan to install electrical renewable energy systems or solar water heating systems that they plan to monitor. VPPSA does not own the systems that they plan to monitor, and they have indicated that no employee that is an immediate family member of the owner of any systems will serve as the independent monitor intends to monitor. Table 1 below outlines VPPSA’s proposed rates.

<b>Table 1: Fees for Independent Monitoring</b>		
<b>Description</b>	<b>Unit</b>	<b>Rate</b>
VPPSA Members	Monthly	Included in Central Dispatch Agreement
Non-VPPSA Members		
Application Assistance	Flat Fee	As Negotiated
Meter Inspection	Flat Fee	As Negotiated
Independent Monitoring & Reporting	Monthly	As Negotiated

An affidavit was provided and signed by David Mullett, General Manager, VPPSA.

***Recommendation***

Staff has reviewed the VPPSA application to become an independent monitor and can attest that the applicant has provided the necessary certification demonstrating that it meets the requirements set forth in Puc 2505.09. Therefore, Staff recommends that the Commission approve VPPSA’s request for independent monitor status provided that it meets the affiliation restrictions listed in Puc 2505.09 (f), has a compensation fee independent of the number of RECs produced and performs the duties listed in Puc 2505.09 (h).