


STATE OF NEW HAMPSHIRE

Intra-Department Communication

DATE: January 24, 2014


AT (OFFICE): NHPUC

FROM: Barbara Bernstein 
Sustainable Energy Analyst

NHPUC 24JAN14PM1:46

SUBJECT: DE 14-011 New Hampshire Electric Cooperative, Inc.
Request for Waiver of PUC Rule 2505.09(b)

TO: Chairman Amy L. Ignatius
Commissioner Robert R. Scott
Commissioner Martin P. Honigberg
Debra A. Howland, Executive Director and Secretary

CC: Jack K. Ruderman, Director of the Sustainable Energy Division 
David J. Shulock, Staff Attorney

Summary

On January 14, 2014, the Commission received a request for a waiver of PUC Rule 2505.09(b) from New Hampshire Electric Cooperative, Inc. (NHEC) to allow NHEC to serve as an independent monitor outside its service territory for the NHEC Raymond District Office 0.04 megawatt photovoltaic array located at 266 Route 27, Raymond, NH. This waiver request is similar to the NHEC request made for the NHEC Sunapee District Office and approved by the Commission on March 25, 2013. Staff has reviewed the Request for Waiver of PUC Rule 2505.09(b) and recommends that Commission grant the request for waiver as it pertains to this site.

Analysis - Waiver of PUC Rule 2505.09(b)

The NHEC Raymond District Office is located within the Public Service Company of New Hampshire (PSNH) franchise service area and PSNH provides electricity to this location. NHEC has followed the PSNH "Simplified Process Interconnection Application and Service Agreement" and received PSNH approval for the interconnection to their distribution system as a net-metered account. A Request for Waiver of PUC Rule 2505.09(b) is required because the rule states:

*A public utility that is a distribution company pursuant to RSA 362-F:2, XIV shall be eligible to serve as an independent monitor for customer-sited sources **within its service territory**...*

NHEC is requesting a waiver of 2505.09(b) in order to allow NHEC to serve as an independent monitor outside its service territory for this site. Rule Puc 201.05 provides that the Commission may waive the provisions of any of its rules if the waiver serves the public

interest and will not disrupt the orderly and efficient resolution of matters before the Commission. There is no detriment to PSNH as a result of this requested waiver because PSNH does not serve as an independent monitor. The waiver request points out that it is logical that, under the unique circumstances of this case, where the site is owned by NHEC, and NHEC otherwise serves as an independent monitor, the purpose of the rule can be satisfied by the waiving of it in this particular circumstance.

In this case the monitor will be NHEC, if the waiver is granted, and the output from the Sunapee District Office will be included in NHEC's aggregation. In addition to reporting each source's output to the Commission, NHEC will include the total output of this facility when it reports the total output of all of its Class II eligible facilities, under the name *NHEC Class II Aggregation*, to the NEPOOL Generation Information System.

Recommendation

Staff has reviewed NHEC's waiver request for the PV array located at the NHEC Raymond District Office and can affirm it is complete pursuant to Puc 2505.08. Staff recommends that the Commission grant NHEC a waiver to Puc 2505.09(b) for the Sunapee District Office effective as of January 14, 2014.