

STATE OF NEW HAMPSHIRE

Intra-Department Communication

DATE: March 31, 2010

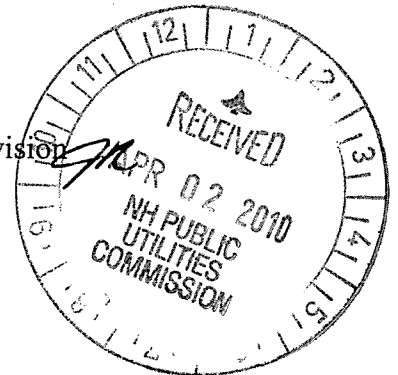
AT (OFFICE): NHPUC

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

SUBJECT: Staff Recommendation Re: DE 09-255, William P. Short's Request for Certification as an Independent Monitor Pursuant to Puc 2502.09

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 November 25, 2009, William P. Short III submitted an application requesting the Commission grant him independent monitor status pursuant to New Hampshire Code of Admin. Rules Puc 2505.09. As an independent monitor, Mr. Short would provide monitoring services for customer-sited sources located in New Hampshire that qualify for New Hampshire renewable energy certificates (RECs) and are equal to or greater than 500 kilowatts in gross nameplate generation capacity.

According to his application, Mr. Short qualifies as an independent monitor pursuant to Puc 2505.09 (c) because he is certified as an independent monitor under another state's renewable portfolio standard program. Specifically, he is certified as an Independent Third Party Meter Reader (ITPMR) by the Massachusetts Department of Energy Resources (Mass DOER). As an independent monitor, Mr. Short must perform a series of tasks required under Puc 2505.09 (h) that includes performing the initial meter inspection, measuring the source's annual production, reporting annual production to the Commission and the inspection of customer-sited projects.

Staff has reviewed Mr. Short's application to become an independent monitor and can attest that the applicant has provided the necessary certification demonstrating that the applicant meets the requirements set forth in Puc 2505.09. Therefore, Staff recommends the Commission grant his request to become an independent monitor for customer-sited sources that qualify for New Hampshire RECs.

Analysis

Puc 2505.09 (c) 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. Mr. Short provided documentation and Staff verified that he is certified as an ITPMP by Mass DOER. Specifically, Mr. Short provided statement of qualification applications for the Richey Properties and the William Stone facilities that included notification from Mass DOER certifying Mr. Short as the ITPMP for both facilities.¹ Both the facilities have also been certified to participate in New Hampshire's RPS program.

Because Mr. Short is approved as an ITPMP in Massachusetts, he is also certified as a third party meter reader under the NEPOOL GIS program. The GIS Operating Rules 2.5 (j) requires third party meter readers to provide meter data meeting the requirements of ISO New England Operating Procedure No. 18: *Metering and Telemetering Criteria*.

Mr. Short does not currently have an agreement to provide monitoring services for a New Hampshire-based REC qualified facility. When he does enter into such an agreement, Puc 2505.09 forbids Mr. Short from being be a member of the immediate family of the owner of the source he wishes to monitor. Mr. Short will also be restricted from selling or installing the equipment used by the source. The RPS rules also prohibit Mr. Short from receiving compensation that is a function of the number of RECs issued to any source. According to his application, Mr. Short does not have any such business relationship or compensation agreement with the Massachusetts-based sources that he currently monitors.

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 31st 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).

According to his application, Mr. Short will first inspect his clients' meter(s) for accuracy and the capability to measure and record the power produced. He will also require each facility to have a metering arrangement that will allow hourly, daily and monthly totals to be read on-line. Mr. Short avers that his customers' meters will be inspected annually and their production compared against the remote meter reading data for accuracy. Mr. Short also proposes to read and report production on a monthly basis to

¹ Mr. Short provided a statement of qualification application for the Richey Properties facilities that included an email from Howard B. Bernstein certifying Mr. Short as the ITPMR for that facility. Mr. Short also provided a copy of a letter from Robert Sydney, General Counsel of Mass DOER, granting Mr. Short ITPMR status for the Williams Stone facility.

the NEPOOL GIS. Although Mr. Short states that he may report production annually, Staff recommends that the Commission require Mr. Short to report annual production to the Commission by January 31 as required under Puc 2505.09 (h).

Recommendation

Mr. Short meets the independent monitor requirements listed in Puc 2505.09 (c). Therefore, Staff recommends that the Commission approve Mr. Short's request for independent monitor status provided that he 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).