



BCC Solar Energy Advantage, Inc.

56 Warren Street, Boston, Massachusetts, 02119-3236 617.427.8600

12/9/09

Ms. Debra A. Howland
Executive Director and Secretary
State of New Hampshire
Public Utilities Commission
21 S. Fruit St, Suite 10
Concord, NH 03301-2429



Re: DE 09-106, 09-107, 09-108, 09-109, 09-110,
Boston Community Capital Solar Energy Advantage, Inc.
Request for GIS Aggregation ID Number

Dear Ms. Howland:

Maureen Reno from your office has previously requested that we submit our solar projects for approval and Certification as NH REC Eligible Facilities as individual generators under the New Hampshire Renewable Energy Portfolio Standards. We have been advised by both James Webb of NEPOOL GIS Administrator APX and by Howard Bernstein of the Massachusetts DOER, that we should aggregate these small generators into a single aggregation in the GIS system.

Under GIS rule 2.1 (a) (vi) - More than one generating unit represented by the same Non-NEPOOL Generator Representative may elect to be treated as a single GIS Generator.

Under GIS rule 2.1 (c) - Non-NEPOOL Generator Representatives must report generation data to the GIS Administrator separately for each state in which the generation occurred. We expect to have all of our generators for each state in a separate aggregation. Right now, all of our generators are in Massachusetts.

As per Ms. Reno's advice, we are formally requesting an aggregation identification number for an aggregation of several of our projects.

That aggregation is currently approved and certified by Massachusetts and listed on the GIS:
BCC, Solar Energy Advantage, Inc. – Aggregation 1.

Specifically we would like to aggregate:

- DE 09-106 BCC Solar Energy Advantage – Washington Elms
- DE 09-107 BCC Solar Energy Advantage – Walden Square
- DE 09-108 BCC Solar Energy Advantage – North Village
- DE 09-109 BCC Solar Energy Advantage – Riverview
- DE 09-110 BCC Solar Energy Advantage – Mishawum

DE 09-207 BCC Solar Energy Advantage – Champ Homes
DE 09-208 BCC Solar Energy Advantage – Hopkinton Middle School
DE 09-228 BCC Solar Energy Advantage – Hopkinton Fire Station
DE 09-229 BCC BCC Solar Energy Advantage – Hopkinton Police Station
DE 09-230 Solar Energy Advantage – Hopkinton High School

From our communications with your office, we trust that the RECs for each project will remain eligible be traded based on their original approval dates provided by your office. As we discussed by e-mail and telephone, recognizing the timing of the approval process and that some of these projects were producing power prior to your Certification as NH REC Eligible Facilities, we propose to send you an aggregation report for each quarter from our GIS approved independent third party verification and reporting agent, Powerdash LLC. In that report, Powerdash would break out the power production for each generator which received Certification as NH REC Eligible Facilities during that quarter. In that report, we would break out the power and RECs generated for each of those facilities both prior and after the specific date of your Certification as NH REC Eligible Facilities. In that way we can be very clear that only those RECs approved for Certification are traded in the NH REC market. Any RECS generated prior to those dates we would trade in other markets where approval has been received.

Please let me know if there is any further information you would need from us in order to issue an ID number for our aggregation.

Thank you very much again for all the help and advice your office has offered in getting these issues resolved. We realize that the project approval systems were not all originally designed with aggregation owners in mind. However, aggregated project ownership is becoming an increasingly popular and important factor in the solar market and we really appreciate your support in making the systems work effectively for aggregation owners like BCC Solar Energy Advantage, Inc.

Sincerely,

A handwritten signature in dark ink, appearing to read 'F. Unger', with a stylized flourish at the end.

Fred Unger
Project Manager

Cc: DeWitt Jones, BCC Solar Energy Advantage, Inc.
Stephen Lapointe, Powerdash, LLC
James Webb, APX Environmental Markets