

# STATE OF NEW HAMPSHIRE

## Intra-Department Communication

DATE: July 8, 2010  
AT (OFFICE): NHPUC

FROM: Maureen L. Reno *MLR*  
Utility Analyst

SUBJECT: Staff Recommendation Re: DE 10-145 Integrys Energy Services, Inc.'s Application for Class II Eligibility of the Crimson Photovoltaic Facility Pursuant to RSA 362-F on behalf of Crimson Solar, LLC

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 May 25, 2010, Integrys Energy Services, Inc. (Integrys Energy) submitted an application on behalf of Crimson Solar, LLC (Crimson Solar) requesting that the Commission grant approval of the Crimson customer-sited photovoltaic rooftop array (Crimson facility) to produce Class II Renewable Energy Certificates (RECs) pursuant to RSA 362-F, New Hampshire's 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.

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 Crimson facility application was completed on June 25, 2010.<sup>1</sup> The Crimson facility meets the eligibility requirements under RSA 362-F:4, II as a Class II facility and complies with the New Hampshire Code of Administrative Rules Puc 2500. Based on its review of the application, Staff recommends that the Commission approve the Crimson photovoltaic facility as eligible for Class II RECs effective June 25, 2010.

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<sup>1</sup> On June 8, 2010, Staff issued a deficiency letter requesting additional information that the applicant provided on June 25, 2010.

## *Analysis*

The Crimson facility is a 500 kilowatt customer-sited photovoltaic rooftop array located at 395 Arsenal Street, Building 311, Watertown, Massachusetts that began operation in December 2009. Since the facility is a customer-sited source, its output is not recorded in the New England Power Pool (NEPOOL) Market Settlement System and, as a result, the facility's output must be monitored and verified by an independent monitor pursuant to Puc 2505.09. The application identifies William P. Short as the independent monitor.<sup>2</sup> The facility's NEPOOL Generation Information System facility code is NON 32910.

Pursuant to Puc 2505.02 (b) (8), the applicant must submit proof that it has "an approved interconnection study on file with the Commission, is a party to a currently effective interconnection agreement, or is otherwise not required to undertake an interconnection study." The applicant submitted and Staff verified that the facility's interconnection agreement between NSTAR Electric and Crimson Solar became effective December 9, 2009.

Pursuant to Puc 2505.02 (b) (11), the applicant is required to include a statement as to whether the facility has been certified under another non-federal jurisdiction's renewable portfolio standard and provide proof thereof. The applicant stated and Staff verified that the Crimson facility qualifies as a Class I renewable energy source in the State of Massachusetts.

## *Recommendation*

Staff has reviewed the Crimson facility application and can affirm it is complete pursuant to Puc 2505.02. Staff recommends that the Commission certify the Crimson facility as being eligible for Class II RECs effective June 25, 2010, the date on which Staff was able to make a determination that the facility meets the requirements for certification as a Class II renewable energy source.

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<sup>2</sup> On July 10, 2009, the Massachusetts Department of Energy Resources approved Mr. Short as an independent third party meter reader pursuant to the NEPOOL GIS Operating Rule 2.5 (j).