STATE OF NEW HAMPSHIRE

Intra-Department Communication

DATE: October 26, 2010 **AT (OFFICE):** NHPUC

FROM: Maureen L. Reno *MLR* Utility Analyst

SUBJECT: Staff Recommendation Re: DE 10-265, Unitil Energy Services Corporation's Application for Class II Eligibility of the Exeter High School Photovoltaic Facility Pursuant to RSA 362-F on behalf of Revolution Energy, 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 October 7, 2010, Unitil Energy Services Corporation (UES) submitted an application on behalf of Revolution Energy, LLC (RE) requesting that the Commission grant approval of the Exeter High School customer-sited photovoltaic array (Exeter High School facility) to produce Class II Renewable Energy Certificates (RECs) pursuant to RSA 362-F, New Hampshire's Renewable Portfolio Standard law. 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 Exeter High School facility application was completed on October 7, 2010. The Exeter High School 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 Exeter High School photovoltaic facility as eligible for Class II RECs effective October 7, 2010.

Analysis

The Exeter High School facility is a 100 kilowatt customer-sited photovoltaic array located at 1 Bluehawk Drive, Exeter, New Hampshire that began operation on August 31, 2010.¹ 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 Paul Button, of Energy Audits Unlimited, as the independent monitor.² The applicant will provide the facility's NEPOOL Generation Information System facility code when it becomes available.

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 UES and RE became effective on August 17, 2010.

Recommendation

Staff has reviewed the Exeter High School facility application and can affirm that it is complete pursuant to Puc 2505.02. Staff recommends that the Commission certify the Exeter High School facility as being eligible for Class II RECs effective October 7, 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.

¹ August 31, 2010 is the date on which UES notified RE that tested the inverter and replaced the existing meter with a net meter, thereby, authorizing RE to energize its generator and interconnect to UES' electric system.

² On June 14, 2010, the Commission issued a secretarial letter granting Mr. Button independent monitor status pursuant to Puc 2505.09.