

STATE OF NEW HAMPSHIRE

Intra-Department Communication

DATE: September 15, 2011

AT (OFFICE): NHPUC

FROM: Barbara Bernstein ^{BB}
Sustainable Energy Analyst

SUBJECT: Re: **Docket No. DE 11-099**

- Conservation Services Group's Application on behalf of Princeton Crossing L.P., for Class II Eligibility for Renewable Energy Certificates (RECs) Generated by the Princeton Common, 1 Technology Drive, Chelmsford, MA Photovoltaic Array Pursuant to RSA 362-F.
- **Staff Recommends Eligibility be Granted.**

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 ^{JR}
Suzanne Amidon, Staff Attorney

Summary

Staff has reviewed the application for the Princeton Crossing L.P. (Princeton Crossing), Princeton Commons photovoltaic facility located at 1 Technology Drive, Chelmsford, MA, (1 Technology Drive) and determined that it 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 2505.02. Staff recommends Commission approval for this facility as eligible for Class II Renewable Energy Certificates (RECs) effective August 2, 2011.

Background

On April 20, 2011, Conservation Services Group (CSG) submitted an application on behalf of Princeton Crossing requesting the Commission grant approval of the 1 Technology Drive photovoltaic facility to produce Class II (RECs).¹ The initial application was reviewed and a letter of deficiency was sent May 19, 2011. Additional information was received June 15, 2011. A second letter of deficiency was sent on July 25, 2011; a response was received August 2, 2011. In a non-adjudicative process, the

¹RSA 362-F:4, II, Class II eligibility requires a facility to produce electricity from solar technologies and to have initiated operations after January 1, 2006.

Commission is required to issue a determination of whether a facility meets a particular classification within 45 days of receipt of a completed application (RSA 362-F).

The 1 Technology Drive facility began operation on December 8, 2010 and is a customer-sited photovoltaic rooftop array with a total gross nameplate capacity is 22.4 kilowatts (kW). As 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. The application identifies PowerDash LLC as the independent monitor responsible for both monitoring and verifying the facility's output.²

The applicant must prove 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 (Puc 2505.02 (b) (8)). The applicant submitted and Staff verified the facility's interconnection agreement between Massachusetts Electric Company and Kurt Shillington d/b/a Princeton Commons, effective January 12, 2011.

A statement as to whether the facility has been certified under another non-federal jurisdiction's renewable portfolio standards and proof thereof is required of the applicant (Puc 2505.02 (b) (11)). The applicant indicated that the 1 Technology Drive facility is not certified as a renewable energy source in another state's renewable portfolio standard program.

On April 9, 2010, the Commission also granted CSG the authority to aggregate customer-sited sources for 17 facilities referred to as the Princeton Properties Solar Aggregation (Princeton Aggregation)³ pursuant to Puc 2506. In addition to reporting each sources' output to the Commission, CSG will include the total output of the 1 Technology Drive solar array (as a Class II Aggregation) when it reports the total output of all of its Class II eligible facilities to the NEPOOL Generation Information System.⁴

Based on the foregoing analysis, staff recommends the Commission grant certification of the Princeton Commons photovoltaic facility effective August 2, 2011.

² In October 2009, the Massachusetts Department of Energy Resources approved PowerDash as an independent third party meter reader pursuant to the NEPOOL GIS Operating Rule 2.5 (j).

³ See DE 10-056.

⁴ Puc 2505.01 states that no customer-sited source shall be certified as eligible to acquire RECs unless it is located in NH. However, RSA 362-F:6, II states that "[t]he commission shall establish procedures by which electricity production not tracked by ISO-New England from customer-sited sources, including behind the meter production, may be included within the certificate program, provided such sources are located in New Hampshire." This applies only to small-scale facilities located in New Hampshire that produce less than 1 megawatt hour per year. Since the NEPOOL GIS system can be used to track sources that generate in excess of 1MWh per year, such customer-sited sources can be located outside of NH.