

# STATE OF NEW HAMPSHIRE

## Intra-Department Communication

**DATE:** September 13, 2011

**AT (OFFICE):** NHPUC

**FROM:** Barbara Bernstein   
Sustainable Energy Analyst

**SUBJECT:** Re: Docket Number DE 11-100

- 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 Commons, Boston Road Photovoltaic Array Pursuant to RSA 362-F.
- **Staff Recommends Approval of Eligibility to Receive RECs.**

**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*

Staff has reviewed the Princeton Crossing, L.P. (Princeton Crossing), Princeton Commons, Boston Road (Boston Road) photovoltaic facility<sup>1</sup> application and determined that it meets the eligibility requirements under RSA 362-F:4, II as a Class II photovoltaic 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 Boston Road photovoltaic facility to produce Class II RECs.<sup>2</sup>

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

<sup>1</sup> The Princeton Commons Boston Road Facility is located at 499 Boston Road in Billerica, Massachusetts and includes Buildings 2, 3, 4, &5. The Boston Road facility is located in Billerica; Lowell is the mailing address.

<sup>2</sup> RSA 362-F:4, II, Class II eligibility requires a facility to produce electricity from solar technologies and for operations beginning after January 1, 2006.

receipt of a completed application (RSA 362-F:11, I). An initial application was reviewed and a letter of deficiency sent May 19, 2011. A second letter of deficiency was sent on July 25, 2011; a response to that letter was received August 2, 2011.

The Boston Road facility is a customer-sited photovoltaic rooftop array located on Buildings 2, 3, 4, & 5 with a total gross nameplate capacity of 120.96 kilowatts. Each array's New Hampshire certification code is listed in the following table.

Array Location	Total kW (per Application)	NH Certification Code
499 Boston Road, Building #2	30	NH-II-11-018
499 Boston Road, Building #3	30	NH-II-11-019
499 Boston Road, Building #4	30	NH-II-11-020
499 Boston Road, Building #5	30	NH-II-11-021

The facility began operation on November 4, 2010. Because 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. The application identifies PowerDash LLC as the independent monitor.<sup>3</sup> Power Dash will use Princeton Crossing's NEPOOL GIS code, NON 32919, to report the total monthly aggregate output of this facility together with those approved under docket DE-10-156, NH-II-10-091.

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's submission included verification of the facility's interconnection agreement between Massachusetts Electric Company and Kurt Shillington d/b/a Princeton Commons, effective November 4, 2010.

A statement as to whether the facility has been certified under another non-federal jurisdiction's renewable portfolio standards and proof thereof is also required of the applicant (Puc 2505.02 (b) (11)). The applicant indicated the Boston Road 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)<sup>4</sup> pursuant to Puc 2506. In addition to reporting each sources' output to the Commission, CSG will include the total output of Princeton Commons Boston Road (as a Class II Aggregation) when it reports the total output of all its Class II eligible facilities to the NEPOOL Generation Information.<sup>5</sup>

<sup>3</sup>In October 2009, the Massachusetts Department of Energy Resources approved PowerDash as an independent third party meter reader pursuant to the NEPOOL Operating Rule 2.5(j).

<sup>4</sup> See DE 10-056.

<sup>5</sup> 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

Staff recommends that the Commission approve the Princeton Commons Boston Road as eligible to receive Class II RECs based on the foregoing analysis.

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**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.**