

STATE OF NEW HAMPSHIRE

Intra-Department Communication

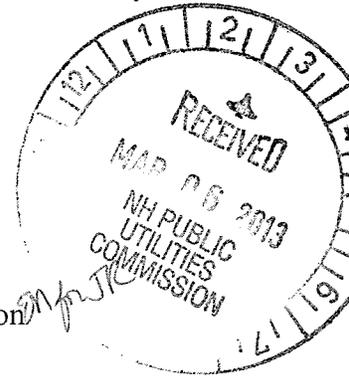
DATE: March 06, 2013
AT (OFFICE): NHPUC

FROM: Barbara Bernstein 
Sustainable Energy Analyst

SUBJECT: DE – 13-025 New Hampshire Electric Cooperative, Inc.
1) Certification Request for Class II Eligibility for the Photovoltaic Array
at NHEC's Sunapee District Office Pursuant to RSA 362-F:4
2) Request for Waiver of PUC Rule 2505.09(b)

TO: Chairman Amy L. Ignatius
Commissioner Robert R. Scott
Commissioner Michael Harrington
Debra A. Howland, Executive Director and Secretary

CC: Jack K. Ruderman, Director of the Sustainable Energy Division
Suzanne Amidon, Staff Attorney



Summary

1) Certification Request. On January 23, 2013, New Hampshire Electric Cooperative, Inc. (NHEC) submitted an application requesting Class II certification for the .01836 megawatts (MW) of electrical production generated by the photovoltaic (PV) array installed at its Sunapee District Office, 604 Sunapee Street, Newport, NH, pursuant to RSA 362-F, New Hampshire's Renewable Portfolio Standard law. Staff has reviewed the certification request and has 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 2500. Staff has determined that the application was complete as submitted and recommends Commission approval for the Sunapee District Office PV array as a Class II renewable energy source effective January 23, 2013.

2) Waiver of PUC Rule 2505.09(b). NHEC is requesting a waiver of 2505.09(b) in order to allow NHEC to serve as an independent monitor outside its service territory for this site only. Staff has reviewed the Request for Waiver of PUC Rule 2505.09(b) and recommends that Commission grant the request for waiver as it pertains to this site.

Analysis

1) Certification Request. To qualify as a facility eligible to produce RECs, Puc 2505.02 (b) requires the source to provide the following:

1. *The name and address of the applicant.* The applicant is NHEC. The main office is located at 579 Tenney Mountain Highway, Plymouth, NH 03264-3154. The PV array is located at its Sunapee District Office, 604 Sunapee Street, Newport, NH.
2. *A complete list of the equipment used at the facility, including the meter and, if applicable, the inverter.* The Sunapee District Office PV array utilizes 72 Suniva OPT 255 watt solar panels, 3 SMA Sunny Boy 6000US inverters, 2 remote mounting racks, one Siemens 200 amp fused disconnect for inverters, one Elster Type R2S REC meter and one 400 amp meter enclosure for the REC meter.
3. *The name, license number and contact information of the installer of the applicable generation or solar heating equipment, or a statement that the equipment was installed directly by the customer.* The system was installed by Frase Electric, LLC.
4. *The name and contact information of the seller of the applicable generation or heating equipment.* The equipment was purchased from Frase Electric, LLC, 789 Whittier Highway, South Tamworth, NH 03883.
5. *The name and contact information of the independent monitor of the source.*
If the Request for Waiver is granted, the facility's output will be reported to the GIS through NHEC¹.
6. *A copy of the interconnection agreement pursuant to PUC 307.06, if applicable, between the applicant and the distribution utility.* A copy of the interconnection agreement between Public Service Company of New Hampshire and NHEC dated January 09, 2013 was provided.
7. *An attestation by the applicant that the project is installed and operating in conformance with any applicable building codes.* An attestation stating that the project is installed and operating in conformance with applicable building codes signed by Gary S. Lemay, PE, Renewable Energy Engineer, NHEC, was included with the application.
8. *For an installation with electric output, documentation of the applicable distribution utility's approval of the installation.* A copy of the interconnection agreement between Public Service Company of New Hampshire and NHEC dated January 09, 2013 provides approval of the installation.

RSA 362-F:6 requires the renewable portfolio standard program to utilize the regional generation information system (GIS) of energy certificates administered by ISO-New England. The GIS facility code assigned to NHEC Class II PV aggregation is NON 32900.

This facility is a customer-sited sources and therefore:

¹ The Commission granted NHEC such status on May 12, 2009 in DE 09-006. On April 9, 2010, the Commission also granted NHEC the authority to aggregate customer-sited sources pursuant to Puc 2506. See DE 10-060.

- The New England Independent System Operator asset identification number is not applicable;
- The output is not recorded in the New England Power Pool (NEPOOL) Market Settlement System; and,
- The output must be monitored and verified by an independent monitor (Puc 2505.09).

In this case the monitor will be NHEC if the waiver is granted and the output from the Sunapee District Office will be included in NHEC's aggregation. In addition to reporting each source's output to the Commission, NHEC will include the total output of this facility when it reports the total output of all of its Class II eligible facilities, under the name *NHEC Class II Aggregation*, to the NEPOOL Generation Information System.

2) Waiver of PUC Rule 2505.09(b). A Request for Waiver of PUC Rule 2505.09(b) was required because the rule states:
A public utility that is a distribution company pursuant to RSA 362-F:2, XIV shall be eligible to serve as an independent monitor for customer-sited sources within its service territory...

NHEC is requesting a waiver of 2505.09(b) in order to allow NHEC to serve as an independent monitor outside its service territory for this site only. Rule Puc 201.05 provides that the Commission may waive the provisions of any of its rules if the waiver serves the public interest and will not disrupt the orderly and efficient resolution of matters before the Commission. There is no detriment to PSNH as a result of this requested waiver because PSNH does not serve as an independent monitor. The waiver request points out that it is logical that, under the unique circumstances of this case, where the site is owned by NHEC, and NHEC otherwise serves as an independent monitor, the purpose of the rule can be satisfied by the waiving of it in this particular circumstance.

Recommendation

Staff has reviewed NHEC's application and waiver request for the photovoltaic array located at the Sunapee District Office and can affirm it is complete pursuant to Puc 2505.08. Staff recommends that the Commission certify the photovoltaic array for the Sunapee District Office as an eligible facility for Class II RECs effective January 23, 2013 and grant NHEC a waiver to Puc 2505.09(b) for the Sunapee District Office.