

Technical Working Group Meeting 12/2/08 2-4pm

Draft Meeting Notes

Attendees: Adje Mensah, Charlie Garrison, Dave Riedel, Fred Hauber, John Moynihan, John Teague, Julie Weiser, Kevin Wright, Larry Barth, Mark Valori, Peter Robilotta, Robert Menist, Scott Schultz.

Phone Attendees: Louis Balberito, Bright Idea Energy; Berish, BPU; Beth

Handouts: PowerPoint Slide on Project Milestones shown on screen, if on phone told to email Cynthia Surman for handout.

Agenda:

- **Welcome & intro**
- **Topics for discussion**
 - **Creation of SRECS – Timing of Implementation**
 - The consensus on this issue from this TWG meeting is to be brought to the REC Meeting Jan. 20th.
 - The discussion began with a review of project milestones of a typical renewable energy project.
 - Mark V. went through the process for the CORE Incentive Programs depicted on a slide.
 - A discussion ensued
 - Scott S. asked for the meaning of Incentives. Mark V. stated he was speaking of rebates.
 - **Two SREC Issues:**
 - When are SRECS eligible to be generated?
 - When is a system eligible for rebate incentive?
 - **1) When are SRECS eligible to be generated?**
 - Mark V. reviewed a project paper trail by going through the steps in this process via the slide. A discussion about this process and system occurred.
 - *Contract* – with customer
 - *Procure* – material order
 - *Initiate Permits* – application / approval to proceed with construction
 - *Install* – no document trail
 - *Finalize Permit* – permit approval / final submission on incentive
 - *Apply for Interconnection* - application
 - *Interconnection Approval* – we do not see a paper trail
 - A discussion about this process and system occurred.
 - It was mentioned that the installers are receiving the interconnection approval from the utilities. Via a letter or email.

- There was an initial consensus that the interconnection approval date should be the date that SRECs should be eligible to be generated.
- It was determined that an order from the BPU would be needed to create the turnaround time from the utilities to have this produced within a certain time period. (30 days was mentioned).
- Further discussion ensued on this.
- Mark V. asked if installers are being notified and have some paper trail that the utility has given approval for the systems to be activated.
- Someone mentioned that with PSE&G you sometimes have to wait for the meter to be switched. When this happens you usually get an answer verbally from the technician and then they may follow up on the paperwork.
- Mark V. said we are trying to make this process oriented. We are talking about having permits in place and interconnection approval. Also, obtaining a document from the installer of the interconnection approval date for the system. There should be a requirement for the utility that the utility should swap out the meter and send out the approval letters.
 - It was recommended to see if there was something like this in place.
 - We know that the utilities have a directed timeline for the beginning of the process, but it doesn't appear that there is a timeframe for the end of the process.
- Based on the experience of the installers, the application is approved and then there is a time frame that they are waiting for the utility meter to be switched out.
 - The interconnection application, Pg. 1, is for the utility authorization to proceed with construction
 - Then the utility sends an approval letter.
 - The utility isn't sending an issue to operate letter.
- Mark V. proposed that the start of SREC generation be from the date that the meter has been switched.
- Fred H. stated he thinks this should be a simple board directive that within 30 days of AHH approval then the utility needs to provide an interconnection approval.
- Mark V. re-emphasized we need a document with a defined date to show interconnection approval
- Mark V. asked what the difference is if we decide that the date is the approval to interconnect or the date the new meter is changed.
 - Scott S. mentioned that this doesn't take into account projects that don't need new meters.

- Charlie G. said this has been a loosely applied standard that the board is trying to get their hands around. We should come up with a default for those exceptions.
 - Scott S. said they need 30 day window from application interconnection approval (via electronic or mail)
 - Mark V. asked if there is a difference in approval to interconnect and approval to operate.
 - It was mentioned that the approval letter does addresses the meter change out and when the system can be turned on.
 - Mark V. asked what the down side is if the meter is not being switched out when you get your approval?
 - Under producing energy.
 - Not overproducing
 - Creates a billing problem if turned system on.
 - SRECs are determined by meter, calculated number, Fat spaniel type meter.
 - Mark V. mentioned it is date on kwh meter when system comes live, not utility meter.
 - Going to use date that installer received from the utility is approved.
 - Scott mentioned modifying the timeline if we are using this as a tool.
 - It was mentioned that some of the installers have experienced where the utility is out of utility meters and told that you cannot turn the system on because there is a billing issue.
 - Mark V. asked if there was a consensus that the SREC generation should be the approval letter.
 - Everyone seemed to be in agreement about this however there was also consensus that utility should be mandated to swap out meter within a defined timeframe.
- **2) When is a system eligible for rebate incentive?**
 - Mark V. stated we need verifiable documentation in order to verify when a system is eligible for an incentive. A discussion ensued with regards to the system eligibility.
 - Scott S. mentioned according to Lance we have something in place that mentions that the application is submitted before the system is installed.
 - Larry B. said we allowed this to happen because there are long queues. Now we are going back to enforce this. He asked what the piece of paper is that enforces this.
 - Fred H. mentioned that you must have an application in place before construction has started.
 - Mark V. asked how do we verify that the construction hasn't begun prior to issuance of an approval letter.

- Scott S. mentioned permits.
- It was brought up that Lance mentioned you can't even install your system if you want the rebate.
- Fred H. mentioned that it should be the permit which Mark mentioned.
- Scott S. recommended that there should be a grace period for people in the queue.
- Mark V. mentioned that we want to implement this going forward.
- Dave R. mentioned permit document would be the earliest period of time that you start construction.
 - It expires in 12 months - new construction
 - Fred H. mentioned it expires in 6 months for renovations.
- Dave R. mentioned that you may apply for the permit ahead of time, because it takes awhile to get them. We need to be careful to use this date as the construction start date.
- Fred H. recommending bringing to the board to set aside money from the board. Mark replied that this was essentially a queue by board order and did not believe it would be acceptable.
- Fred H. mentioned that we should catch the people that are violating the law and remove them from the program.
- Scott S. mentioned that we should use the permit date, but leave an exception. The installer would need to show that no construction has occurred and show the order /delivery of modules and inverters.
- Scott S., recommend changing the letter to specifically mention that we will not give a rebate if the system is constructed ahead of the approval.
- There was a discussion as to the legality of the installer doing this.
- Mark V. again stated the need to determine an enforceable date.
- Kevin W. asked about projects where this has already been done, do we want to allow the installer to own up for what they have done?
- Scott S. mentioned having a brief amnesty period.
- It was mentioned that we may open up a can of worms by enforcing this now and it might be best to start enforcement of this starting for the 2009 program.
- There is a possibility that the interconnection agreement 1st pg done and submitted to utility ahead of time.
- Fred H. asked what difference does it make to the program if a new roof is going up and the modules are put on when this is done. (if it is before the application)

- Mark V. reiterated that Fred H. is saying that a system isn't built until it has been interconnected.
 - In this instance there are 2 options
 - Turn it on and don't get rebates
 - Don't turn it on and wait for approval to get rebate.
- It was recommended to add to the 10 Year Cert, a paragraph with the application that if they activate the system prior to acceptance into the program they waive their right to a rebate.
- Charlie G. said it all goes back to the utility date and getting the interconnection approval date from the utility.
- Scott mentioned making this more prominent on the Application Form.
 - Charlie G. mentioned we could do this.
 - In summary a consensus was achieved that a system isn't built until it is interconnected. If it is interconnected prior to issuance of acceptance into the program it invalidates any recourse for obtaining a rebate. The language in the application package should validate this.
- Mark V. will sum this up discussion/consensus in a PowerPoint summary for the next REC meeting.
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- **Topics for next year**
 - Kevin W. passed out training interest survey.
 - Fred H. had a question on the upcoming wind site assessor training.
 - Mark V. mentioned 4 days of training, additionally in the 1st half of 09 there will be other training. Other items required will be monitoring of two site assessments and administration of an examination. There will be fees for the examination and mentoring of the site assessment.
 - Mark V. mentioned there will also be trainings for the program in 2009 with regard to the inspection process changing from a QC to a QA inspection process.

Next Meeting: Mark V. will send out a schedule for the Technical Working Group meetings in 2009. There will not be a meeting in January.