

From: renewables-bounces@njcleanenergy.com on behalf of [Hunter, B](#)
To: renewables@njcleanenergy.com
Subject: Background information and attachments for RE agenda items IV. Solar Act's Investigating Volatility and VI. RPS's SREC metering issues
Date: Tuesday, March 12, 2013 6:18:12 PM
Attachments: [Alpha Inception Comments on Solar Development VolatilityDiscussion - Final Feb 14 2012.pdf](#)
[SEIA comments on RE Committee agenda - 122112.pdf](#)
[Quantum Solar comments on Solar Act Volatility.pdf](#)
[RenuEnergy_SolarDevelopmentVolatility-Discussion-0113.pdf](#)
[2013-03-11 PSE&G Proposal to Address Solar MeteringIssue.pdf](#)
[njac Title 14 Chapter 3-7.2 c and e.pdf](#)
[ATT00001.txt](#)

RE list:

Find attached items relevant to tomorrow's RE Committee meeting:

Agenda Item

IV. Discussion of the Solar Act

c. Investigating Approaches to Mitigate Solar Development Volatility

See attached the responses to Staff's call for comments on SEIA's questions relevant to defining Solar Development Volatility from RENU, Quantum and Alpha Inception that we were unable to discuss last month. We will give the authors five minutes to summarize their responses and answer questions. Following the discussion of individual responses to the questions posed by SEIA, I would like to finalize the conversation on defining the problem and start to scope possible solutions. My expectation is that following this discussion staff will be able to issue a similar request for input toward further development of a problem statement and an array of potential solutions and next steps to fulfill the Board/legislative directive.

VI. RPS Issues

a. Implementation of metering requirements at N.J.A.C. 14:8-2.9 c

In assisting a GATS account holder in inputting their metered solar generation for a solar system larger than 10 kW, staff discovered that the GATS user interface provided prompts to account holders on what solar generation numbers were expected based on system parameters. Staff subsequently learned that GATS in other cases was accepting account holder calculations of metered data to develop the MWh generation data toward creating SRECs.

In response, Staff directed GATS to inform account holders that with the June 4, 2012 RPS rule amendments (N.J.A.C. 14:8-2.9 (c)), the Board would no longer accept the estimation of generation toward creating SRECs. Since the GATS user interface cannot handle the input of more than one data point in the submission of generation data, account holders with interval meters serving as solar generation meters are unable to input sufficient data to account for MWhs produced without first performing a calculation involving the meter's multiplier and an associated index. Staff initially brought the issue to the RE Committee last month and requested additional information from the EDCs since they have been prolific adopters of

interval meters in the EDC Solar Finance Programs. Staff subsequently met with PSEG and two its Solar Loan customers to discuss the problem and potential solutions and requested PS to submit a problem description.

PSEG also informed staff that it has been estimating generation data for the purposes of SREC creation as part of the Solar Loan program and seeks formal approval to continue to do so. PSEG believes the Board rules for electricity billing at N.J.A.C 14:3-7.2 (c) and (e) give it authority to estimate generation data for the purposes of SREC creation consistent with the RPS rules at N.J.A.C. 14:8-2.9 (c). Find PSEG's proposal and a copy of the rules governing EDC estimation of electric bills attached and we may circulate some additional data tomorrow.

Staff seeks input on how it can satisfy the rule requirements "the readings may be taken or submitted by any person, but shall be verified by the Board or its designee". Since GATS does not perform verification work, this responsibility falls to the Board.

Scott

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From: Hunter, B
Sent: Tuesday, March 12, 2013 1:54 PM
To: Garrison Charlie (Honeywell) (charlie.j.garrison@honeywell.com)
Subject: Draft announcement for agenda items

Charlie,

Please review and advise.

1. On the agenda I forgot to advise you to remove discussion of subsection u. under IV. b., so please reword as

b. Update on Subsection t.; Certification Program and Incentives

c. I will resend the remaining responses and frame the discussion for tomorrow

and

VI. I'll have language for you shortly

When do you plan to send out the agenda?

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