



Sustainable Energy Division
New Hampshire Department of Energy
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

July 23, 2024

Dear Sustainable Energy Division of the New Hampshire Department of Energy,

The Community Power Coalition of New Hampshire (CPCNH) respectfully submits the accompanying application to register as an aggregator of both electric and thermal renewable energy credits (RECs) in New Hampshire.

CPCNH is a non-profit Joint Powers Agency incorporated in 2021 to help Community Power Aggregations (CPAs) throughout New Hampshire realize their energy goals. The coalition has been growing rapidly: as of July 1, 2024, membership stood at 59 CPAs across 57 municipalities and two (2) counties.

One key service that CPCNH provides to member CPAs is the provision of “all-requirements” electricity service. CPCNH offers a portfolio of four electricity products with different levels of renewable generation (minimum RPS level, 33%, 50%, or 100%) from which customers of member CPAs can choose. To comply with New Hampshire’s RPS, and to support the additional renewable generation in its higher-content products, CPCNH purchases RECs. Rather than buy those RECs from third-party brokers or other aggregators, CPCNH would prefer to buy them directly from customer-generators in the communities that it serves. To that end, CPCNH is applying to become an aggregator of NH RPS-qualifying RECs.

Although CPCNH provides electricity service to customers of member CPAs, it is not a load-serving entity (LSE). As a relatively new organization, CPCNH has not yet built up the internal capacity (in terms of staffing, systems, infrastructure, etc.) nor the creditworthiness to serve as an LSE. Instead, CPCNH has contracted with Calpine Community Energy to provide LSE service on its behalf. CPCNH may eventually become an LSE, but not for the foreseeable future.

Within this context, CPCNH envisions REC aggregation as a way to provide a useful service to member CPAs while also procuring some of the RECs that it needs to support its electricity products. Customer-generators in the communities that CPCNH serves—i.e., those that form a CPA and join the Coalition—will have a new/additional outlet for selling RECs. If those customer-generators desire to join the CPCNH aggregation, CPCNH will direct them to the list of Independent Monitors maintained by the New Hampshire Department of Energy,¹ from which they will select one to work with (if needed). Once they have contracted with an Independent Monitor of their choosing, CPCNH will register their facilities in the NEPOOL GIS system as part of the CPCNH aggregation. As aggregated facilities generate electricity and create RECs over

¹ <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/inline-documents/sonh/independent-monitor-list.pdf>

time, CPCNH will pay the system owners for those RECs and then transfer them within the NEPOOL GIS system to Calpine Community Energy—CPCNH’s LSE—to be retired.

According to the list maintained by the New Hampshire Department of Energy,² there are currently only four active aggregators of electrical and/or thermal RECs registered in New Hampshire, and only one of those four aggregators is actually based in New Hampshire. With this application, CPCNH—a New Hampshire-based nonprofit—aspires to offer New Hampshire customer-generators an additional choice for REC sales. Moreover, CPCNH intends to retire all of the locally generated RECs that it aggregates and purchases to demonstrate compliance with New Hampshire’s own RPS and to otherwise support the electricity products that it sells right here in New Hampshire.

I hope you agree that allowing CPCNH to register as a REC aggregator will expand customer choice and help support a competitive electricity market and the deployment of renewable generation across New Hampshire. I look forward to hearing from you.

Best regards,

A handwritten signature in black ink that reads "Mark Bolinger" with a stylized flourish at the end.

Mark Bolinger, Director of Projects and Programs
Community Power Coalition of New Hampshire
PO Box 840
Concord, NH 03302

603-306-7611
mark.bolinger@communitypowernh.gov

² <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/inline-documents/sonh/list-of-registered-rec-aggregator.pdf>



State of New Hampshire
Department of Energy
 21 S. Fruit Street, Suite 10, Concord, NH 03301-2429



**APPLICATION FOR REGISTRATON AS AN AGGREGATOR OF
 RENEWABLE ENERGY CREDITS Revised October 10, 2023**

Pursuant to New Hampshire Administrative Code [Puc 2507](#) "A person not otherwise qualified to obtain certificates may purchase, combine, and re-sell certificates if such person registers as an aggregator pursuant to this section."

INSTRUCTIONS

- | | |
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| <input checked="" type="checkbox"/> Please submit one (1) original and two (2) paper copies of the completed application and cover letter to:
Sustainable Division
New Hampshire Department of Energy
21 South Fruit Street, Suite 10
Concord, NH 03301-2429 | <input checked="" type="checkbox"/> Send an electronic version of the completed application and the cover letter electronically to
recapplicationgroup@energy.nh.gov

<input checked="" type="checkbox"/> The cover letter must include complete contact information. Pursuant to Puc 2505.01, the Department is required to render a decision on an application within 45 days of receiving a complete application. |
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If you have any questions please contact 603-271-3670 or recapplicationgroup@energy.nh.gov

CONTACT INFORMATION Puc 2507.01(b)

Aggregator -Name:	Community Power Coalition of New Hampshire (CPCNH)		
Mailing Address:	PO Box 840 / Concord, NH 03302		
Primary Contact	Mark Bolinger		
Town/City:	Concord	State:	NH Zip Code: 03302
Telephone:	603-306-7611	Cell:	603-306-7611
Email	mark.bolinger@communitypowernh.gov		

Identification of the independent monitor or monitors responsible for verifying the production of energy from the applicable customer-sited sources pursuant to **Puc 2507.01(b)(3)**.

CPCNH will not be working exclusively with any specific independent monitor; rather, we will leave the choice of independent monitor up to the PV system owners. As such, the PV systems whose RECs we hope to aggregate could be using any of the independent monitors on the list maintained by the NH Department of Energy (see <https://www.energy.nh.gov/sites/g/files/ehbemt551/files/inline-documents/sonh/independent-monitor-list.pdf>).

In the space provided below, please provide a disclosure statement indicating whether there is any family or business relationship between such independent monitor, or monitors, and the aggregator pursuant to **2507.01(b)(4)**. *(The box provided will expand to accommodate the disclosure statement.)*

CPCNH does not have any familial or business relationships with any of the independent monitors on the list maintained by the NH Department of Energy.

Puc 2507.01 (c) states that an aggregator may aggregate certificates only if:

- (1) The associated generation uses the same energy resource and technology, as described in Puc 2502.06 and Puc 2502.07, Puc 2502.08 and Puc 2502.09.
- (2) The energy associated with the certificates was produced in the same year.
- (3) Each source to be aggregated has a unique GIS number.

Please initial that you have a full understanding of and agree to abide by Puc 2507.01(c).	Please Initial & Date	
	Initial	Date
	MB	07/23/2024

Puc 2507.01 (d) states that an aggregator shall provide the Commission with at least 30 days' notice before discontinuing the provision of aggregator services.

Please initial that you have a full understanding of and agree to abide by Puc 2507.01(d).

Please Initial & Date	
Initial	Date
MB	07/23/2024

PROHIBITED RELATIONSHIPS Puc 2507.02

(a) An aggregator shall not aggregate certificates from a customer-sited source, -a source producing useful thermal energy, or a facility producing biodiesel, if the aggregator has a prohibited relationship to an independent monitor for such source or facility.

(b) For purposes of this section, "prohibited relationship" means:

- (1) A direct or indirect ownership interest comprising at least ten percent of the stock or other equity of an entity.
- (2) Common direct or indirect ownership of at least ten percent
- (3) Membership in the same household or immediate family, or
- (4) Service as an officer, director, partner, employee, agent or fiduciary.

(c) If a prohibited relationship pursuant to (b) exists between an independent monitor and any member of an aggregator's household or immediate family, then the aggregator shall also be deemed to have such a prohibited relationship pursuant to this section.

Please initial that you have a full understanding of and agree to abide by Puc 2507.02

Please Initial & Date	
Initial	Date
MB	07/23/2024

In order to qualify as an Aggregator of Renewable Energy Certificates (RECs), you must register with the NEPOOL – GIS. Contact information for the GIS administrator follows:

[NEPOOL GIS](#)

GIS Assigned Aggregator Number

Enter GIS Assigned Aggregator #

19663

OTHER REQUIRED INFORMATION

The State of New Hampshire requires a person conducting business under any name other than his/her own legal name to register with the [NH Secretary of State](#).

Please initial that your business is registered with the [NH Secretary of State](#).

Please Initial & Date	
Initial	Date
MB	07/23/2024

Please initial that you have a full understanding of and agree to abide by Puc 2507.

Please Initial & Date	
Initial	Date
MB	07/23/2024