

**North American Association of Issuing Bodies
Behind the Meter Subcommittee
Final Meeting Notes**

March 15, 2006 2:00- 3:00pm EDT

Telephone Participants:

- Robert Burke, ISO NE/GIS
- Lynn Fountain (sitting in for Paul Belval) DBH/GIS
- Joe Kerecman, PJM EIS/GATS
- Dan Lieberman, CRS
- Greg Morris, EMF/WREGIS
- Aleka Niedermier, CRS
- Jan Pepper, Clean Power Markets/NJ SRECs
- Ken Schuyler, PJM/GATS
- Sam Swanson, Clean Power Markets/NJ SRECs
- Kate Zocchetti, CEC/WREGIS

Introduction:

The goals of this call were to:

- Discuss recommended common practices for treatment of Behind-the-Meter (BTM) Certificates

CRS circulated a document for discussion entitled “Recommended Common Practices for Treatment of Behind-the-Meter (Customer-Sited Distributed Generation) Certificates,” referred hereafter as “the document.” The meeting went through the text of the document.

The group agreed on the stated recommendations and goals below:

- parity among the regions in terms of the quality of BTM certificates

- policies that are not prohibitively expensive
- assurance that the certificates are legitimate
- only setting policies for BTM facilities where absolutely necessary – it is preferred to have the same policy for BTM facilities as for non-BTM facilities.

Joe Kreceman brought up an issue related to the size of BTM facilities. In an effort to establish a definition of BTM facilities, the document sets a standard that Behind-the-Meter facilities can be as large as 60 MW or as small as 1 kW of PV. Joe mentioned that there are facilities larger than 60 MW and that, to avoid confusion on this issue, we should work to define BTM facilities as specifically behind the retail meter, regardless of their size. Joe felt that because our current definition of BTM facilities is not necessarily dependent upon their size, that our definition should also not include a size limit.

The group then moved on to discuss the three definitions of BTM in the document. The group agreed that language relating to a specific tracking system should be deleted and replaced with more generic language.

Meredith Wingate asked if there are any instances where BTM generators are connected to the market settlement system (MSS), as this may be another defining characteristic. In general, most BTM generators are not connected to the MSS, because the generation is used on site, though in GIS, BTM generators larger than 5MW are required to become members of the MSS. NEPOOL representatives didn't know whether there actually are BTM generators greater than 5MW that are members of the MSS or whether they just decide the expense is not worth it, and opt out of the GIS. The group wanted to go back and think about whether this characteristic should be added to the definition.

Dan Lieberman re-stated that the purpose of this discussion is to try to find the common ground on BTM issues while also acknowledging that there will be regional variances.

Recommended Common Practices

(1) Generator Registration and Verification of Static Information:

In the document, the group suggested changing “state regulators” to “utility regulators.”

Dan started the discussion by asking if BTM generators should be treated differently than regular generators in terms of generator registration and verification and static data.

Robert Burke stated that his first reaction would be to say that these two generators should not be treated differently. However, the group pointed out that the one thing that is significantly different is that you don't have dynamic telemeter data coming into the system with BTM facilities.

Ken Schuyler stated that a submittal of an EIA form 860 is required (in GATS) during registration for all generators who are 1 MW and above and that this form simply serves as another verification of data. Requiring BTM generators to submit this form as well was proposed although, ultimately this idea was rejected by the group because it is a very long form, and

administrative costs of requiring this might outweigh the benefits. The conversation went back and forth about whether BTM generators should be treated differently than regular generators. The group recognized that the registration process varies between systems in terms of requirements. The group also recognized that differing levels of verification of static data occur. In GATS and GIS, the verification is left to the states, and is generally minimal for BTM generators. In WREGIS, NJ SRECs and proposed in M-RETS, verification will be more rigorous for BTM systems.

Decision: In the end, the group agreed that BTM generators regardless of size, should be treated the same as non-BTM generators with respect to generator registration, including all of the requirements that registration entails in a particular tracking system. All BTM generators 1 MW or larger in nameplate capacity, should be treated the same as non-BTM generators with respect to verification of static information, to the extent that such verification occurs. The group left open the possibility of differential treatment of BTM facilities less than 1 MW in nameplate capacity with regards to verification of static information.

Announcements about Upcoming Meetings:

The call adjourned at noon however the group decided to pick up the discussion on March 21, at 2:00 EST. This time was originally scheduled for a NAAIB working group call.