

July 1, 2016

DE 10-128

Debra Howland  
Executive Director, NH PUC  
21 South Fruit Street, Suite 10  
Concord, NH 03301

NHPUC 11JUL'16PM12:16

RE: Request for Rule Waivers Related to Monitoring and Verification Process

Dear Ms. Howland,

Energy Audits Unlimited (EAU) was approved as an independent monitor of New Hampshire customer-sited sources generating renewable electricity production in 2010 (Docket DE 10-128). The waiver requests that EAU is requesting for Puc 2505.09(a), Puc 2505.09(i)(2), and Puc 2505.09(j) would enable EAU customers to use the Knollwood Energy of MA LLC (Knollwood) electronic portal for entering renewable energy source production data. In addition, the waiver request for Puc 2505.09(i)(1) reflects the difficulty of meeting the requirements of the rule as currently written.

As photovoltaic systems have proliferated, the system that EAU developed in 2010 to monitor and verify generation from customer-sited sources has become cumbersome, inefficient and expensive. In the process of attempting to develop a new, automated service for EAU's customers, several insurmountable challenges have been encountered. If the New Hampshire PUC approves the requested rules waivers, Knollwood will offer its customer portal and data entry system, initially developed for the Generation Attribute Tracking System (GATS) used by Mid-Atlantic States, to EAU's independent monitoring customers. The portal allows customers to enter their generation information; a formula is then applied that identifies and flags any anomalies in production data reported. Knollwood does not manipulate the information; it then sends the generation values to EAU for verification and reporting. EAU would then upload the information directly to the NEPOOL-GIS (GIS) tracking system.

EAU requests waivers of the following Puc 2505.09 rules subsections:

***Puc 2505.09(a) An independent monitor shall verify the electricity production of a customer-sited source or the production of useful thermal energy from an eligible source and report such production and REC calculations to the GIS. A customer-sited source shall retain the services of an independent monitor directly.***

EAU will continue to verify the electricity production of the customer-sited sources it monitors and report such production and REC calculations directly to the GIS, based on the source production data collected and reported to it by EAU. As always, the contract for independent monitoring services is signed directly between EAU and the customer.

***Puc 2505.09(i)(2) To measure and verify quarterly the source's electricity or useful thermal energy production used to qualify for certificates pursuant to the GIS operating rules:***

Customers of EAU and Knollwood will have the ability to enter their production monthly into the Knollwood customer portal. Knollwood will then provide EAU with a spreadsheet of the customer's meter readings, noting any observed data anomalies. Any Knollwood customer that chooses not to use the portal can still provide meter readings directly to EAU. All other customers will still provide meter readings directly to EAU. As mentioned above, EAU will then verify the production data and upload the data quarterly directly to the GIS system.

***Puc 2505.09(j) An independent monitor shall not receive compensation for monitoring services that is a function of the number of certificates issued to any source using the***

EAU will continue to charge a flat rate for independent monitoring services. Knollwood is offering the use of its portal at no charge to its customers to ensure that REC production can be securely and accurately entered into the GIS database. While Knollwood has a financial interest in the production of RECs from those customers' sources, it will receive no compensation for its data collection and reporting activities that is based on the number of RECs produced by these sources.

***Puc 2505.09(i)(1): To perform an initial inspection of the source's meters for accuracy and capability to measure the electricity or useful thermal energy produced, unless the meter is owned by a distribution utility that has already inspected it pursuant to Puc 305.***

The sheer number of systems requesting the independent monitoring services of EAU has become so great that it is impossible to complete an initial inspection for each source. In addition, the requirements of this rule may be satisfied by an alternative approach not based on initial inspection for the following reasons:

- (i) The electrician on the site at the time of the PV installation ensures that the meter is correctly installed and functioning, so an additional visit by an independent monitor is unnecessary and redundant; and
- (ii) An initial date-stamped photo of the installed meter sent to the independent monitor provides equivalent clarification as an on-site inspection visit.

Sincerely,

Signature:   
Paul L. Button (Jul 7, 2016)

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