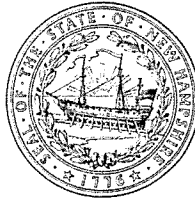


THE STATE OF NEW HAMPSHIRE

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February 25, 2016

Stephen Lapointe  
President  
PowerDash Inc.  
50 Church Street, 5th Floor  
Cambridge, MA 02138

Re: REC 16-215, PowerDash Inc. Request for Waiver of Puc 2505.09(i)(1)  
On-Site REC Meter Inspection Requirement for Independent Monitors

Dear Mr. Lapointe:

By letter dated February 9, 2016, PowerDash Inc., a prospective independent monitor (IM) for the New Hampshire renewable portfolio standard (RPS) program, requested a rule waiver from the requirement under Puc 2505.09(i)(1) for IMs to conduct on-site inspection of renewable energy certificate (REC) meters installed at customer-sited renewable energy source locations, and proposed an alternative method of obtaining and verifying the relevant information that does not require on-site inspection.

Staff reviewed and evaluated PowerDash's rule waiver request and filed a memorandum on February 19, 2016 summarizing its review and recommending that the Commission decide whether the rule waiver may be granted. Staff described the alternative method proposed to be used by PowerDash, which is based on electronic communications using revenue grade meters and software interfaces (API) that permit monitoring of electric production through the installed meters and from the installed inverters. These meters are claimed to be revenue quality (grade) meeting at least +/- 2% accuracy as confirmed by testing from a nationally recognized testing laboratory, are ANSI C12.20 certified, and meet applicable NEPOOL-GIS requirements. The use of this proposed alternative process is intended to provide assurance equivalent to that required under Puc 2505.09(i)(1), without the need for an on-site REC meter inspection. In addition, the proposed alternative process should permit PowerDash to continually verify photovoltaic (PV) system power generation in a manner that is at least as reliable as the current system of generation data validation that is typically provided by photographs of meters sent to IMs by system owners.

On February 25, 2016, Staff filed a supplemental memorandum describing PowerDash's commitment to confirm that the specific serial number of each installed REC meter can be associated with the specific location of its installation, through the installer's representation or

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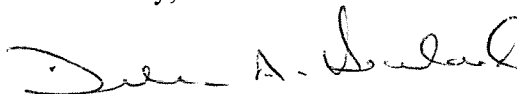
inverter-based data retrieval, and to track such specific meter serial number through the electronic data communications used to monitor and verify system production.

Staff emphasized the urgent need to register additional IMs in view of the recent proliferation of PV system installations in New Hampshire and the corresponding increase in RPS Class II REC applications. In the absence of flexibility in the performance of the required IM duties, there is likely to be a critical shortage of IMs actively providing service in the State. If a sufficient number of approved and active IMs is not available, then Class II REC applications for new PV systems could no longer be approved by the Commission.

The Commission has reviewed PowerDash's rule waiver request and Staff's memorandum, and has determined that the requested rule waiver would serve the public interest and would not disrupt the orderly and efficient resolution of matters before the Commission, as required under Puc 201.05. In determining the public interest would be served, the Commission found that the purpose of the rule would be satisfied by the alternative method proposed.

Accordingly, PowerDash is granted a waiver from the Puc 2505.09(i)(l) on-site meter inspection requirement, provided that it uses the alternative methodology described in its request letter and in Staff's memoranda.

Sincerely,

A handwritten signature in dark ink, appearing to read "Debra A. Howland", written in a cursive style.

Debra A. Howland  
Executive Director

cc: Service List  
Docket File

**SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED**

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**Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.**

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Docket #: 16-215-1 . Printed: February 25, 2016

**FILING INSTRUCTIONS:**

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:** DEBRA A HOWLAND  
EXEC DIRECTOR  
NHPUC  
21 S. FRUIT ST, SUITE 10  
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**