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EXECUTIVE DIRECTOR

STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION 21 S. Fruit St., Suite 10 Concord, N.H. 03301-2429 TDD Access: Relay NH 1-800-735-2964

Tel. (603) 271-2431

FAX No. 271-3878

Website: www.puc.nh.gov

August 14, 2017

Will Troppe Senior Analyst, Technical Solutions Power Factors 80 E. Sir Francis Drake Blvd., Suite 2F Larkspur, CA 94939

Re: REC 17-027 Power Factors' Waiver Request of Puc 2505.09(i)(1) Requirement

for Independent Monitors to Perform On-Site Inspection

Dear Mr. Troppe:

On February 10, 2017, the Commission received an application from Power Factors requesting approval as an independent monitor for Class II solar photovoltaic (PV) facilities under the Puc 2500 rules regarding the Renewable Portfolio Standard (RPS). The attached letter requested a waiver of Puc 2505.09(i)(1). Power Factors proposes to implement a remote validation, monitoring, and reporting process that varies in certain respects from the process contemplated by the Puc 2500 RPS rules.

The rule states that one of the duties of the independent monitor is to perform an initial on-site inspection of the installed meter to confirm its accuracy and verify it is capable of measuring production. Power Factors proposed an alternative method of complying with the rule, and stated that the necessary validations could be performed remotely.

Commission Staff reviewed and evaluated the Power Factors rule waiver request and its additional clarifying communications, and Staff filed a memorandum on August 3, 2017 summarizing its review and recommending that the Commission grant the requested rule waiver to permit Power Factors to be approved as an independent monitor.

The Commission has reviewed the Power Factors rule waiver request and Staff's recommendation, and has determined that the requested waiver of Puc 2505.09(i)(1) 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.

August 9, 2017 Power Factors for Waiver of Puc 2505.09 Page two

Accordingly, Power Factors is granted a waiver from the relevant provisions of Puc 2505.09(i)(1).

Sincerely,

Debra A. Howland Executive Director

cc: Ser

Service List

Docket File

SERVICE LIST - EMAIL ADDRESSES- DOCKET RELATED

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 #: 17-027-1 Printed: August 16, 2017

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**

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- 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.