

THE STATE OF NEW HAMPSHIRE

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July 14, 2016

Paul Button
Energy Audits Unlimited
85 Yvette Street
Manchester, NH 03102

Re: DE 10-128, Energy Audits Unlimited, Approval of Request for Waivers
of Puc 2505.09 Rules Requirements for Independent Monitors

Dear Mr. Button:

On July 11, 2016, Energy Audits Unlimited (EAU) filed a letter requesting waivers from certain Puc 2505.09 rules provisions governing independent monitors, in connection with its proposed new alternative monitoring, verification, and reporting process. That process would provide EAU customers with the opportunity to use an on-line portal maintained by Knollwood Energy of MA LLC (Knollwood), a registered aggregator of renewable energy certificates (RECs), to enter their customer-sited renewable energy source production data. Knollwood's system would run the production data thus entered through a formula that identifies and flags any anomalies in the reported data, and then Knollwood would send to EAU periodically a spreadsheet containing the customer generation data and noting any observed data anomalies. EAU would verify the information received from Knollwood, investigate and resolve any identified data anomalies, and upload the verified information directly to the NEPOOL-GIS (GIS) tracking system to support the creation of RECs. Customers would continue to take photographs of their revenue grade production meters and would provide an initial photo of the installed meter to EAU and retain monthly photos of the meter to be provided to EAU upon request in order to verify reported production data.

EAU requested waivers from Puc 2505.09(a) and Puc 2505.09(i)(2), which require verification of customer-sited source electric production, and from Puc 2505.09(j), which prohibits compensation for monitoring services that is a function of the number of RECs issued, in order to implement its new proposed alternative monitoring, verification, and reporting process. In addition, EAU requested a waiver from the initial inspection requirement under Puc 2505.09(i)(1), citing the difficulty of meeting the requirements of the rule as currently written.

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Staff reviewed and evaluated EAU's rules waiver requests and filed a memorandum on July 14, 2016, summarizing its review and recommending that the Commission grant the requested rules waivers so that EAU's proposed new alternative independent monitoring process may be implemented and it may be relieved from the initial inspection requirement.

The Commission has reviewed EAU's rules waiver requests and Staff's memorandum and has determined that, subject to the conditions stated below, the requested waivers of Puc 2505.09(a), Puc 2505.09(i)(2), and 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. In determining the public interest would be served by such rules waivers, the Commission found that compliance with the rules would be onerous given the circumstances of the affected person and that the purpose of the rules would be satisfied by the alternative method proposed.

The foregoing rules waivers are subject to the conditions that (1) EAU complete for each calendar quarter a full verification review of no less than five percent (5.0%) of its customers using the Knollwood portal, such verified customer sample to vary from quarter-to-quarter, (2) EAU file with the Commission a written certification of its quarterly full verification reviews on an annual basis at the time it files its annual independent monitor report under Puc 2505.09(i)(3), (3) the new alternative process only be applicable to sources with capacity (AC) of 15 kW or less, and (4) the rules waivers be in effect only until the expiration of twelve (12) months from the date of this letter.

The Commission determined it was not necessary to grant a waiver of Puc 2505.09(j), based on EAU's representation that neither it nor Knollwood would receive any compensation for monitoring services that is a function of the number of RECs issued to any customer-sited renewable energy source using Knollwood's customer data entry portal and EAU's independent monitoring services.

Accordingly, EAU is granted waivers from the relevant provisions of rules Puc 2505.09(a), Puc 2505.09(i)(2), and Puc 2505.09(i)(1), as requested in its letter filed on July 11, 2016, subject to the conditions stated in the bolded paragraph above, effective beginning with RECs produced during the first calendar quarter of 2016.

Sincerely,



Debra A. Howland
Executive Director

cc: 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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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
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21 S. FRUIT ST, SUITE 10
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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.**