

THE STATE OF NEW HAMPSHIRE

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January 24, 2017

J. Matthew Davis, Ph.D.  
Ground Energy Support LLC  
2 Maple Street  
Durham, NH 03824

Re: DE 14-237 Rolling Dog Farm and DE 14-201 Ground Energy Support, LLC Request for Waiver of Puc 2505.09(g) Independent Monitor Rule Waiver Extension Request

Dear Mr. Davis:

On December 7, 2016, J. Matthew Davis, of Ground Energy Support, LLC (GES) filed a letter requesting that the Commission extend the rule waiver granted on December 10, 2014 in connection with Docket DE 14-237, Rolling Dog Farm, to allow GES to continue to provide independent monitoring (IM) services to the owners of geothermal systems to whom GES has also sold equipment used for metering the thermal energy produced by those sources, including Rolling Dog Farm.

GES sells geothermal metering equipment that is installed by another party. In Docket DE 14-237, GES requested a waiver of Puc 2505.09(g), so that it could serve as the IM for Rolling Dog Farm and other geothermal facilities. Puc 2505.09(g) provides that: "No... source producing useful thermal energy shall use an independent monitor... who sold or installed the renewable energy system and associated equipment."

The Commission granted a waiver of Puc 2505.09(g) for GES and Rolling Dog Farm as of December 10, 2014. At that time, Staff recommended that, before the expiration of the two-year waiver period, Rolling Dog Farm should either explain why GES should continue serving as the independent monitor or obtain another IM.

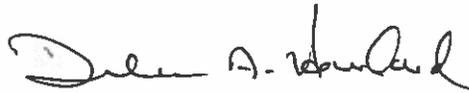
On January 10, 2017, Staff filed a memorandum recommending that Rolling Dog Farm should not have to explain why GES should continue to serve as its IM. GES is currently the only company that has applied for and been approved to be an IM for geothermal systems, and GES therefore currently serves as IM for all geothermal systems that have been approved for thermal RECs. Staff further recommended that the waiver of Puc 2505.09(g) for GES to serve as IM for Rolling Dog Farm and other geothermal systems be extended for an additional two-

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year period, or until such time, if any, as the Puc 2500 rules are modified to address the qualifications of IMs such that no rule waiver is required.

Based on its review of the GES rule waiver extension request and Staff's recommendations, the Commission has granted an extension of the waiver of Puc 2505.09(g) for GES to serve as IM for Rolling Dog Farm and other geothermal systems for an additional two-year period, or until such time, if any, as the Puc 2500 rules are modified to address the qualifications of IMs such that no rule waiver is required.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra A. Howland". The signature is fluid and cursive, with the first name being the most prominent.

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 #: 14-201-1 Printed: January 24, 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  
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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.**