

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: February 12, 2016

AT (OFFICE): NHPUC

NHPUC 12FEB16PM1:42

FROM: Barbara Bernstein
Sustainable Energy Analyst

SUBJECT: REC 16-215 PowerDash Inc. Request for Waiver of the Puc
2505.09(i)(1)
On-Site REC Meter Inspection Requirement

TO: Debra A. Howland, Executive Director and Secretary

CC: Karen Cramton, Director of the Sustainable Energy Division
David K. Wiesner, Staff Attorney

On February 10, 2016, staff received the attached request for a rule waiver from a prospective RPS independent monitor. PowerDash is seeking a waiver of the requirement under Puc 2505.09(i)(1) for independent monitors to conduct on-site inspection of REC meters installed at renewable energy source project locations, and has proposed alternative methods of obtaining and verifying the relevant information that do not require on-site inspection.

Staff recommends that the PowerDash rule waiver request be docketed and reviewed and resolved by the Commission pursuant to Puc 201.05.



February 9, 2016

Barbara Bernstein
Sustainable Energy Division
NH Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Request for rule waiver for the PUC 2505.09(h)(1) on-site inspection requirement, pursuant to PUC 201.05

Dear Ms. Bernstein,

On behalf of our company, a prospective independent verifier for New Hampshire, I am writing to request a rule waiver for the PUC 2505.09(h)(1) on-site inspection requirement, pursuant to PUC 201.05. In this letter I'll cover both the reason for the waiver and alternatives to on-site inspection.

(1) How compliance with the rule would be onerous or inapplicable given our circumstances

The typical procedure for a revenue-grade production meter installation is for the meter to be installed at the time of installation by the installers, along with such equipment as the solar panels and inverters. Our company, which provides a dedicated service for remote monitoring and independent, verified reporting to third parties, is not typically on-site at the time of installation.

In addition, a common trend with residential solar equipment is for the revenue-grade meter to be a more integrated component rather than separate from the power generation equipment. For instance, Enphase, the microinverter manufacturer with a very high market share in residential solar, has released their Envoy S Metered solution in which the ANSI C12 revenue-grade meter is integrated in their overall monitoring equipment solution.

Therefore, in general it would be inapplicable for our company to do this type of on-site inspection, when the installation context often does not offer a separate provision for physical access by a third party. However, PowerDash can be available by phone whenever an installer has a question about meter data validation in the course of installation.

(2) How the purpose of the rule would be satisfied by alternative methods we are prepared to implement if approved

Our understanding of the purpose of this on-site inspection is to verify that the given ANSI C12 meter (identified by its model and serial number) is indeed installed at a given location and that the meter is accurately representing the power generation at that location.

Our view is that the PowerDash application can provide this same level of assurance without doing an on-site inspection. We can track the association between the given metering device and the location in other trusted ways. For instance, with our integration with Enphase, we retrieve the location and equipment inventory (including meter) from their own verified records using the Enphase Enlighten Application Programming Interface (API).



In addition, we are able to continually conduct reasonable data validation by comparing the power generation numbers from the revenue-grade meter with the power generation numbers recorded by a secondary data source such as a given system's microinverters. This always-available comparison between the revenue-grade meter and the inverters is in many ways a more reliable, ongoing method of meter data validation.

To summarize our current alternate approaches, in order for PowerDash to serve as an independent verifier for a system in New Hampshire, we will either need to have direct communications with the revenue-grade meter itself or, if accessing meter data through a manufacturer (such as Enphase), we will require that we have access to both the revenue-grade meter data and also a secondary data source such as the microinverters.

Employing these approaches, we believe PowerDash can accurately fulfill its requirements as an independent verifier for New Hampshire without making on-site inspections.

Thank you for your consideration. Please don't hesitate to get in touch at any time.

Sincerely,

A handwritten signature in black ink that reads "Stephen Lapointe". The signature is fluid and cursive.

Stephen Lapointe
President
PowerDash Inc.

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
EXECUTIVE 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.