

**STATE OF NEW HAMPSHIRE**

## Inter-Department Communication

**DATE:** February 24, 2016**AT (OFFICE):** NHPUC**FROM:** Barbara Bernstein   
Sustainable Energy Analyst**SUBJECT:** REC 16-215 PowerDash Inc. Waiver Request of Puc 2505.09(i)(1) and  
Approval of Power Dash as an Independent Monitor  
**STAFF RECOMMENDS APPROVAL****TO:** Martin P. Honigberg, Chairman  
Robert R. Scott, Commissioner  
Kathryn M. Bailey, Commissioner  
Debra A. Howland, Executive Director and Secretary**CC:** Karen Cramton, Director of the Sustainable Energy Division  
David K. Wiesner, Staff Attorney

This memorandum is intended to supplement my memorandum dated February 19, 2016, which summarized Staff's review of PowerDash's request for 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 recommended that the Commission decide whether the rule waiver should be granted.

Based on additional communications, PowerDash has represented it can confirm that the specific serial number of each installed REC meter is associated with the specific location of its installation, through the installer's representation or inverter-based data retrieval, and that the specific meter serial number can be tracked through the electronic data communications PowerDash would use to monitor and verify system production.

Based on its proposed alternative method to measure and verify renewable electricity production from customer-sited sources, Staff recommends that the Commissioners grant PowerDash's rule waiver request and approve PowerDash to serve as an independent monitor in New Hampshire.

Staff is hopeful that the approval of PowerDash will attract additional independent monitors who also utilize electronic platforms. Staff understands that such electronic monitoring is prevalent in neighboring states where similar data verification is required. An increase in approved and active independent monitors would help alleviate the current situation of effectively having only one active independent monitor for small photovoltaic facilities.

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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)(1) on-site meter inspection requirement, provided that it uses the alternative methodology described in its request letter and in Staff's memoranda.

Sincerely,



Debra A. Howland  
Executive Director

cc: Service List  
Docket File

**LINKED**

2/29/16 CHP

**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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