

THE STATE OF NEW HAMPSHIRE

CHAIRMAN  
Martin P. Honigberg

COMMISSIONERS  
Robert R. Scott  
Kathryn M. Bailey

EXECUTIVE DIRECTOR  
Debra A. Howland



**PUBLIC UTILITIES COMMISSION**  
21 S. Fruit Street, Suite 10  
Concord, N.H. 03301-2429

TDD Access: Relay NH  
1-800-735-2964

Tel. (603) 271-2431

FAX (603) 271-3878

Website:  
[www.puc.nh.gov](http://www.puc.nh.gov)

July 20, 2016

Anton Kaeslin  
President  
Solar Data Systems, Inc.  
23 Francis J. Clarke Circle, Suite 4A  
Bethel, CT 06801

**Re: REC 16-474, Solar Data Systems, Inc. Request for Waivers of Puc 2505.09(i)(1), Puc 2505.09(g), and Puc 2505.09(a) Independent Monitor Requirements**

Dear Mr. Kaeslin:

On April 29, 2016, the Commission received an application from Solar Data Systems, Inc. (SDS) requesting approval as an independent monitor under the Puc 2500 rules regarding the Renewable Portfolio Standard (RPS). SDS proposes to implement a remote electronic monitoring and reporting process for solar photovoltaic (PV) systems that varies in certain respects from the process contemplated by the Puc 2500 RPS rules.

Staff reviewed the application and recommended that SDS resubmit it with certain modifications, together with a request for relevant rules waivers, as discussed in more detail below. SDS resubmitted its application on June 6, 2016 together with a request for waivers from three specific rules: Puc 2505.09(i)(1), which requires the independent monitor to perform an initial inspection of the monitored source's meters for accuracy; Puc 2505.09(g), which prohibits independent monitors who sell equipment associated with the renewable energy system; and Puc 2505.09(a), which requires renewable energy sources to retain the services of an independent monitor directly.

SDS has developed a remote PV monitoring and generation reporting system, specifically designed for residential PV systems, that uses equipment and software included with the system installation. SDS' "Solar-Log" monitoring system includes proprietary software and combines its electronic monitoring equipment with General Electric revenue grade meters, which are ANSI C12.20 certified with  $\pm 0.2\%$  accuracy. According to SDS, the metering equipment and companion software enables SDS to monitor PV system performance remotely and provide automatic, accurate reporting of revenue grade kWh generation. SDS's system detects any anomalies, such as production in excess of reasonably expected system output, and flags these anomalies for further review and verification. The cost of the Solar-Log system is included in the product and installation costs for the PV system and no additional charge is assessed for the monitoring and

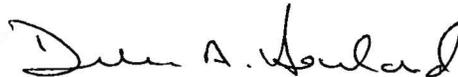
reporting services. According to SDS, the Solar-Log system has been approved for and is in wide use in other state RPS programs, and SDS is approved as an independent monitor in both Massachusetts and Connecticut.

Commission Staff reviewed and evaluated SDS's rule waivers requests and additional clarifying communications, and Staff filed a memorandum on July 18, 2016 summarizing its review and recommending that the Commission grant the three requested rules waivers to permit SDS to implement its Solar-Log remote electronic monitoring process in New Hampshire.

The Commission has reviewed the SDS rules waiver requests and Staff's recommendation and has determined that the requested waivers of Puc 2505.09(i)(1), Puc 2505.09(g), and Puc 2505.09(a) 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 rule waivers, the Commission found that the purpose of the rules would be satisfied by the alternative method proposed.

Accordingly, SDS is granted a waiver from the relevant provisions of Puc 2505.09(i)(1), Puc 2505.09(g), and Puc 2505.09(a).

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.

Executive.Director@puc.nh.gov  
a.kaeslin@solar-log.com  
amanda.noonan@puc.nh.gov  
barbara.bernstein@puc.nh.gov  
david.shulock@puc.nh.gov  
jwebb@apx.com  
karen.cramton@puc.nh.gov  
leszek.stachow@puc.nh.gov  
sandy.deno@puc.nh.gov  
tom.frantz@puc.nh.gov

Docket #: 16-474-1      Printed: July 20, 2016

**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  
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.