

THE STATE OF NEW HAMPSHIRE

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September 27, 2016

Jessica Nee
VP of Fleet Operations
Locus Energy
2 Hudson Place, 6th Floor
Hoboken, NH 07030

Re: REC 16-608, Locus Energy
Request for Waivers of Puc 2505.09(i)(1), Puc 2505.09(g), and Puc 2505.09(a) Independent
Monitor Requirements

Dear Ms. Nee:

On May 23, 2016, the Commission received an application from Locus Energy requesting approval as an independent monitor under the Puc 2500 rules regarding the Renewable Portfolio Standard (RPS). Locus Energy 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.

On September 12, 2016, Locus Energy submitted a letter requesting waivers from three specific provisions of the Puc 2500 RPS 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.

Locus Energy has developed a remote monitoring and generation reporting system, specifically designed for PV, that uses equipment and software included with the PV system installation. According to Locus Energy, its metering equipment and companion software is compatible with, and able to monitor, other third party revenue grade meters on its platform while ensuring automatic, accurate reporting of revenue grade kWh generation. The Locus Energy system detects any anomalies, such as reported production in excess of reasonably expected output or negative data, and Locus Energy has a dedicated team that reviews and verifies anything deemed questionable.

Locus Energy represented that the installed facility location and MAC ID are linked, often in conjunction with the installer and developer registering them in its platform. At the project site,

installers can confirm that the meter and system are online using the meter face, calling to confirm if they are unsure, and/or by logging onto the Locus Energy platform to register the meter using the serial number and inputting the facility location. At times, the project developer or finance or leasing company will register the MAC ID and location on the Locus Energy platform once the installer confirms the system is online.

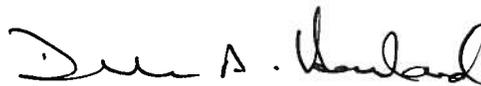
Excluding NEPOOL-GIS, Locus Energy stated that it currently reports generation data and manages portfolios for nine other incentive-based programs nationwide, all of which can be monitored and validated remotely. In addition, the Locus Energy system has been approved for and is in use for independent monitoring in Massachusetts, Connecticut, Maine, Vermont and Rhode Island.

Commission Staff reviewed and evaluated Locus Energy's rules waiver requests and additional clarifying communications, and Staff filed a memorandum on September 21, 2016 summarizing its review and recommending that the Commission grant the three requested rules waivers to permit Locus Energy to implement its remote electronic monitoring process for PV systems installed in New Hampshire.

The Commission has reviewed the Locus Energy 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 rules waivers, the Commission found that the purpose of the rules would be satisfied by the alternative method proposed.

Accordingly, Locus Energy 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

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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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- 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:**
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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.**