

THE STATE OF NEW HAMPSHIRE

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April 3, 2017

Yeekeng Vue
Agency Reporting Program Manager
AlsoEnergy, Inc.
5425 Airport Blvd, Ste 100
Boulder, CO 80301

Re: REC 16-836 AlsoEnergy Request for Waiver of Puc 2505.09(i)(1), Puc 2505.09(a), and Puc 2505.09(g) Requirements for Independent Monitors

Dear Mr. Vue:

On October 17, 2016, the Commission received an application from AlsoEnergy, Inc. (Also Energy) requesting approval as an independent monitor under the Puc 2500 rules regarding the Renewable Portfolio Standard (RPS). AlsoEnergy proposes to implement a remote monitoring and reporting process that varies in certain respects from the process contemplated by the Puc 2500 RPS rules. Staff reviewed the application and recommended that AlsoEnergy file a letter requesting waiver requests for specified rules as discussed in more detail below. AlsoEnergy submitted a letter requesting waivers from three specific rules on December 19, 2016, and provided clarifying information in subsequent email communications.

AlsoEnergy provides a PV independent monitoring and reporting service that delivers comprehensive monitoring and control solutions. AlsoEnergy accesses and collects energy production through a production meter taking measurements directly from the system's AC current lines. AlsoEnergy's system detects any anomalies in meter data and generation data is uploaded to NEPOOL-GIS when all issues are resolved and its REC reporting team confirms data are valid. Upon confirmation, AlsoEnergy reports production directly to the NEPOOL-GIS. According to AlsoEnergy, the company currently provides independent monitoring services for projects in Massachusetts, Connecticut, Vermont, and Rhode Island.

In order to implement its business model for independent monitoring and solar generation reporting, AlsoEnergy requested waivers from three specific rules applicable to independent monitors: Puc 2505.09(i)(1) (initial on-site inspection requirement), Puc

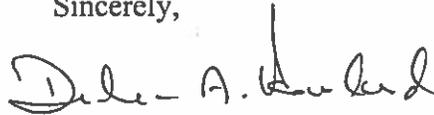
2505.09(g) (monitor cannot have sold the installed system or associated equipment), and Puc 2505.09(a) (customer's direct retention of independent monitor's services).

Commission Staff reviewed and evaluated the AlsoEnergy rule waivers requests and additional clarifying communications, and Staff filed a memorandum on March 27, 2017 summarizing its review and recommending that the Commission grant the three requested rules waivers to permit AlsoEnergy to implement its remote electronic monitoring process in New Hampshire.

The Commission has reviewed the AlsoEnergy 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 methods proposed.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Debra A. Howland". The signature is written in a cursive style with a large initial "D".

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.

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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
EXEC DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
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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.