

THE STATE OF NEW HAMPSHIRE



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**PUBLIC UTILITIES COMMISSION**

21 S. Fruit Street, Suite 10  
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September 20, 2017

Will R. Kessler  
Business Development Manager  
Renewable Energy Development Associates, LLC  
533 Congress Street, Suite 10  
Portland, ME 04101

Re: DE 16-861 Renewable Energy Development Associates, LLC  
Request for Waiver of Puc 2507.02(a), to Allow the Installer of Solar PV Facilities to  
Serve as an Aggregator

Dear Mr. Kessler:

On December 5, 2016, the Commission received a request for a waiver of Puc 2507.02(a) from Renewable Energy Development Associates, LLC (REDA) in connection with its interest in serving as an aggregator under the Puc 2500 rules regarding the Renewable Portfolio Standard (RPS). On April 11, 2017, REDA filed an application for approval to serve as an aggregator if its requested rule waiver is granted. REDA installs solar photovoltaic (PV) systems and proposes to serve as the aggregator of renewable energy certificates (RECs) for those installations, as well as for other renewable energy facilities. This aggregation model varies from that contemplated by the Puc 2500 RPS rules.

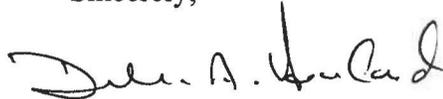
The rule states that an aggregator shall not aggregate RECs from a customer-sited source of renewable energy if the aggregator has a prohibited relationship, including that of equipment installer of the source. REDA stated that a state-approved independent monitor verifies and reports system production data to NEPOOL-GIS at least quarterly for issuance of RECs, while the function of the aggregator is to aggregate and sell issued RECs. Therefore, having the installer perform this aggregator function for facility owners does not create a conflict of interest, provided the RECs are verified and reported by a state-certified independent monitor.

Commission Staff reviewed and evaluated the REDA rule waiver request and its additional clarifying communications, and Staff filed a memorandum on August 24, 2017 summarizing its review and recommending that the Commission grant the requested rule waiver to permit REDA to be approved as an aggregator of New Hampshire RECs.

The Commission has reviewed the REDA rule waiver request and Staff's recommendation, and has determined that the requested waiver of Puc 2507.02(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.

Accordingly, REDA is granted a waiver from the relevant provisions of Puc 2507.02(a).

Sincerely,

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

Debra A. Howland  
Executive Director

cc: Service List  
Docket File

**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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Docket #: 16-861-1      Printed: September 20, 2017

**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.