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STATE OF NEW HAMPSHIRE



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

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

Tel. (603) 271-2431

FAX No. 271-3878

Website:
www.puc.nh.gov

August 14, 2017

Will Troppe
Senior Analyst, Technical Solutions
Power Factors
80 E. Sir Francis Drake Blvd., Suite 2F
Larkspur, CA 94939

Re: REC 17-027 Power Factors' Waiver Request of Puc 2505.09(i)(1) Requirement
for Independent Monitors to Perform On-Site Inspection

Dear Mr. Troppe:

On February 10, 2017, the Commission received an application from Power Factors requesting approval as an independent monitor for Class II solar photovoltaic (PV) facilities under the Puc 2500 rules regarding the Renewable Portfolio Standard (RPS). The attached letter requested a waiver of Puc 2505.09(i)(1). Power Factors proposes to implement a remote validation, monitoring, and reporting process that varies in certain respects from the process contemplated by the Puc 2500 RPS rules.

The rule states that one of the duties of the independent monitor is to perform an initial on-site inspection of the installed meter to confirm its accuracy and verify it is capable of measuring production. Power Factors proposed an alternative method of complying with the rule, and stated that the necessary validations could be performed remotely.

Commission Staff reviewed and evaluated the Power Factors rule waiver request and its additional clarifying communications, and Staff filed a memorandum on August 3, 2017 summarizing its review and recommending that the Commission grant the requested rule waiver to permit Power Factors to be approved as an independent monitor.

The Commission has reviewed the Power Factors rule waiver request and Staff's recommendation, and has determined that the requested waiver of Puc 2505.09(i)(1) 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.

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Accordingly, Power Factors is granted a waiver from the relevant provisions of Puc 2505.09(i)(1).

Sincerely,

A handwritten signature in black ink, appearing to read "Debra A. Howland". The signature is fluid and cursive, with the first name being the most prominent.

Debra A. Howland
Executive Director

cc: Service List
Docket File