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October 20, 2014

Debra Howland
Executive Director
State of New Hampshire
Public Utilities Commission
21 S. Fruit St, Suite 10
Concord, NH 03301-2429

Ms. Howland:

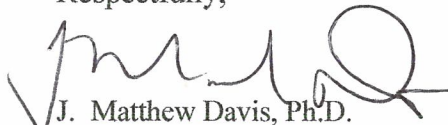
We recently submitted an application on behalf of Rolling Dog Farm (DE14-237), to have their geothermal heat pump system registered as a Renewable Energy Facility pursuant to Puc Order 12,678.

Because we are listed as both their independent monitor and the seller of the metering equipment, we request that the Commission clarify the interpretation of proposed Puc 2506.09(g) that would potentially prevent approval of the application. We interpret "equipment" in proposed Puc 2506.09(g) to refer to the "thermal equipment" and not the metering equipment, though we acknowledge the ambiguity, as has been documented in the rulemaking process. Our Request for Clarification is identified as Part 1 of the enclosure.

If the Commission interprets "equipment" in 2506.09(g) to include both the thermal and metering equipment, then we request that the Commission consider Part 2 of the enclosure as our request for waiver of proposed Puc 2506.09(g) pursuant to Puc 201.05(c).

Thank you for your consideration and please let me know if you have any questions or need any additional information.

Respectfully,



J. Matthew Davis, Ph.D.
Vice President, CTO

Enclosure
Cc: B. Bernstein
S. Smith