

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: February 19, 2016

AT (OFFICE): NHPUC

FROM: Barbara Bernstein 
Sustainable Energy Analyst

NHPUC 19FEB'16am10:04

SUBJECT: REC 16-215 PowerDash Inc. Request for Waiver of Puc 2505.09(i)(1)
On-Site REC Meter Inspection Requirement for Independent Monitors

TO: Martin P. Honigberg, Chairman
Robert R. Scott, Commissioner
Kathryn M. Bailey, Commissioner
Debra A. Howland, Executive Director and Secretary

CC: Karen Cramton, Director of the Sustainable Energy Division
David K. Wiesner, Staff Attorney

On February 10, 2016, Commission Staff received a request for a rule waiver from a prospective RPS independent monitor. PowerDash is seeking a waiver of the requirement under Puc 2505.09(i)(1) for independent monitors to conduct on-site inspection of REC meters installed at renewable energy source project locations, and has proposed alternative methods of obtaining and verifying the relevant information that do not require on-site inspection.

The PowerDash rule waiver request has been docketed and Staff seeks the Commission's review and resolution pursuant to Puc 201.05. Puc 2505.09(i)(1) includes the following as a duty of the RPS independent monitor:

To perform an initial inspection of the source's meters for accuracy and capability to measure the electricity or useful thermal energy produced, unless the meter is owned by a distribution utility that has already inspected it pursuant to Puc 305.

The purpose of this rule is to ensure that the REC meter for every customer-sited source of renewable energy is accurate. The independent monitor's on-site inspection is intended to confirm that the REC meter has been installed properly to verify that the data provided to the NEPOOL-GIS will be accurate.

As the installation of solar photovoltaic (PV) systems in New Hampshire has proliferated over the past year, it has become increasingly difficult for the active independent monitors to visit every installation site to perform the required on-site inspection. While there are currently ten approved independent monitors, only two are active in monitoring solar PV systems. The one independent monitor who has taken on

the vast majority of independent monitoring duties for residential PV systems has indicated that he is no longer able to accept new customers, in large part due to the burdens associated with the independent monitoring requirements under the Commission's rules. This development may result in a critical shortage of approved independent monitors for smaller PV systems.

In its request for a rule waiver, PowerDash describes its proposed alternative approach to inspection and monitoring, which is based on electronic communications using revenue grade meters and software interfaces (API) that permit monitoring of electric production through the meters and from the installed inverters. PowerDash maintains these meters are revenue quality (grade) meeting at least +/- 2% accuracy as confirmed by testing from a nationally recognized testing laboratory, are ANSI C12.20 certified, and meet NEPOOL-GIS requirements. PowerDash further maintains that the use of this alternative process provides assurance equivalent to that required under Puc 2505.09 (i)(1) without the need for an on-site REC meter inspection. In addition, PowerDash claims it can continually verify PV system power generation, and that its alternative approach is at least as reliable as the current system of generation data validation that is typically provided by pictures of meters sent to the independent monitor by the system owner.

In addition, Puc 2505.09(c)(6) states that an independent monitor who verifies electrical production in another state qualifies as an independent monitor in New Hampshire. PowerDash is approved as an independent monitor in Massachusetts and in other states.

If the Commissioners approve this rule waiver, it would be more likely that the State can attract additional independent monitors who also utilize electronic platforms. An increase in approved and active independent monitors would help alleviate the current situation of effectively having only one active independent monitor. Staff understands that such electronic monitoring is prevalent in neighboring states where similar data verification is required.

Staff notes that, in the absence of approved and active independent monitors, REC applications for new Class II systems could no longer be approved.

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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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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:

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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.