

April 29, 2016

Barbara Bernstein
Sustainable Energy Division
State of New Hampshire Public Utility Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2729

RE: Request for rule waiver for the 2505.09 (i)(1) on-site inspection requirement 201.05

Dear Ms. Bernstein,

On behalf of Solar Data Systems, Inc., I am writing to request a rule waiver for 2505.09 (i)(1) on-site inspection requirement for the reasons stated below.

(1) Compliance with the rule would be onerous or inapplicable given our circumstances

Solar-Log® & GE Meters are ANSI C12.20 certified, +/- 0.2% accuracy, revenue grade meters. They are installed at the same time as other solar PV equipment including PV panels and inverters, specifically for remote monitoring. They provide automatic, accurate reporting to third parties who are not typically on-site at the time of installation. Therefore, in general it would be inapplicable for our company to do this type of on-site inspection when the installation context often does not offer physical access by a third party. Solar-Log® technical support can be available by phone if an installer has a question about meter data validation in the course of installation.

(2) The purpose of the rule would be satisfied by alternative methods we are prepared to implement

Our understanding is that the purpose of this rule is to *ensure that the REC meter for every customer-sited source of renewable energy is accurate*. We also understand that the 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*. Our company has the ability to accomplish these assurances through electronic communication without doing an onsite inspection

The Solar-Log & GE Meters will begin reporting to the Solar-Log WEB online application through cellular or LAN connection once they are installed. We are assured of proper installation once the meter appears in the Solar-Log WEB portal and begins reporting.

We are able to continually conduct reasonable data validation through multiple options. We can compare the power generation reported by the revenue-grade meter with the expected power generation through satellite weather data, through plant clustering, or through inverter direct monitoring.

Employing these approaches, we believe Solar-Log® can accurately fulfill its requirements as an independent verifier for New Hampshire without making on-site inspections.

Thank you for your time and consideration. Please don't hesitate to get in touch at any time.

Sincerely,



Anton Kaeslin
President
Solar Data Systems, Inc.