



May 20, 2016

Debra Howland
Executive Director
NH Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

RE: Request for rule waiver for the PUC 2505.09(i)(1) on-site inspection requirement, pursuant to PUC 301.05

Dear Ms. Howland,

I am writing on behalf of Locus Energy, a prospective independent verifier for New Hampshire, to petition that a rule waiver be granted for the PUC 2505.09(i)(1) on-site inspection requirement, in accordance with PUC 301.05, the requirement to "perform an initial inspection of source's meter for accuracy and capability to measure the power produced...". As Locus Energy has significant experience with metering and data validation, we feel confident that this type of initial meter validation and data accuracy verification can be completed without an on-site inspection.

Locus Energy is a data monitoring and analytics platform provider that offers independent, verified reporting to third parties. Revenue grade, production meter installation is typically completed by end users or contracted installers during the final phase of the solar panel and inverter installation. While we often supply the metering hardware, we are not typically on site at the time of installation. Therefore, Locus Energy would not be able to complete an on-site inspection in those instances. In addition, Locus Energy staffs a full time support team to offer technical troubleshooting assistance and answer any SREC-related regulatory inquiries. Excluding NEPOOL, we currently report generation data and manage portfolios for nine other incentive based programs nationwide, all of which can be monitored and validated remotely. Finally, Locus Energy is compatible with, and able to monitor other third party revenue grade meters on our platform. Because of these reasons, it is not feasible nor necessary for Locus Energy to complete on-site inspections.

Locus Energy also feels that alternative meter validations outside of an on-site inspection would sufficiently verify an installation. The purpose of this on-site inspection is to confirm the revenue grade meter's (identified by its model and MAC ID) installation location and power generation accuracy. Through our internal inventory system, we can track the association between the particular metering device (via its MAC ID) and the location. We also complete an analysis of the meter in the field and compare it with our own algorithms to calculate its location, ensuring a match. In addition, we are able to continuously validate data by juxtaposing the power generation readings from the revenue grade meter with the power generation readings archived on the system's backup meters or inverters. Therefore, through multiple methods, we are able to verify a meter's location and certify the validity of the data it is communicating.

Due to the restrictions preventing us from being onsite during an installation, and due to our alternative methods of validating the metering equipment and the data it is transmitting, we are requesting that the PUC 2505.09(i)(1) on-site inspection requirement, pursuant to PUC 301.05, be waived.

We look forward to hearing your response on this matter, and please let us know if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann DeL" or similar, written in a cursive style.

for

Jessica Nee
Vice President, Fleet Operations
Locus Energy

Original



State of New Hampshire
Public Utilities Commission

21 S. Fruit Street, Suite 10, Concord, NH 03301-2429



APPLICATION TO QUALIFY AS AN INDEPENDENT MONITOR

TO VERIFY ELECTRICITY OR USEFUL THERMAL ENERGY PRODUCTION FROM ELIGIBLE CUSTOMER-SITED SOURCES*

This independent monitor application must be filed with the Executive Director of the New Hampshire Public Utilities Commission (Commission). *The completed original application, as well as two copies and a cover letter requesting certification should be sent to:*

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

An electronic version of the docket filing should be submitted to executive.director@puc.nh.gov and barbara.bernstein@puc.nh.gov. Contact Barbara Bernstein by email or phone 603-271-6011 with questions.

Any omissions and/or deficiencies which need to be corrected must be completed in a timely manner or the Commission may close the application process without prejudice.**

Please complete the following:

Applicant Name:	Sam Barnard						
Business Name:	Locus Energy						
Mailing Address 1:	2 Hudson Place						
Mailing Address 2:	6 th Floor						
Town/ City:	Hoboken	State:	NJ	Zip Code:	07030		
Telephone:	1 877 562 8736 Ext. 5	Cell:					
email	Reporting@locusenergy.com						

2505.09	Independent Monitors
2505.09(a)	<i>An independent monitor shall verify the <u>electricity production</u> of a customer-sited source or the production of <u>useful thermal energy</u> from an eligible source and report such production and REC calculation to the GIS.</i>
2505.09(b)	<i>A distribution utility shall be eligible to serve as an independent monitor for customer-sited sources and sources producing useful thermal energy within its service territory, provided that the distribution utility employs one or more persons to perform monitoring tasks who meet the qualifications specified in paragraph (c) or (d). (See below).</i>

As **ATTACHMENT A**, please provide a copy of the license issued by the state of New Hampshire or such other qualifying certification as may be applicable.

Electrical Production Independent Monitors		
2505.09(c)	<i>To qualify as an independent monitor who verifies electrical production please indicate which of the following apply to the applicant:</i>	
2505.09(c)(1)	An electrician licensed by the state of New Hampshire and in good standing.	<input type="checkbox"/>
2505.09(c)(2)	A professional engineer licensed by the state of New Hampshire and in good standing.	<input type="checkbox"/>
2505.09(c)(3)	A certified building analyst professional or a certified mechanical professional as certified by the Building Performance Institute, Inc. of Malta, New York.	<input type="checkbox"/>
2505.09(c)(4)	A certified energy manager as certified by the Association of Energy Engineers.	<input type="checkbox"/>
2505.09(c)(5)	A home energy rater as certified by Residential Energy Services Network (RESNET)	<input type="checkbox"/>
2505.09(c)(6)	Certified as an independent monitor under a renewable portfolio standard program in another state.	<input checked="" type="checkbox"/>

Useful Thermal Energy Independent Monitors		
2505.09(d)	<i>To qualify as an independent monitor who verifies useful thermal energy production please indicate which of the following apply to the applicant:</i>	
2505.09(d)(1)	A professional engineer licensed by the State of NH and in good standing.	<input type="checkbox"/>
2505.09(d)(2)	For verification of useful thermal energy from solar thermal sources , a North American Board of Certified Energy Practitioners (NABCEP) Certified Solar Heating Installer	<input type="checkbox"/>
2505.09(d)(3)	For verification of useful thermal energy from geothermal sources an International Ground Source Heat Pump Association (IGSHPA) Accredited Geothermal Installer	<input type="checkbox"/>

Provide your initials as an indication that you have read the following as it pertains to Independent Monitors and agree to uphold the rule.

Initials

2505.09(a)	An independent monitor shall verify the production of a customer-sited source or the production of useful thermal energy from an eligible source and report such production and REC calculations to the GIS. Such a customer-sited source or a source producing useful thermal energy shall either retain the services of an independent monitor directly or, if participating in aggregation pursuant to Puc 2506, through an aggregator.	SFB
2505.09(b)	A distribution utility that is a distribution company shall be eligible to serve as an independent monitor for customer-sited sources and sources producing useful thermal energy within its service territory, provided that the distribution utility employs one or more persons to perform monitoring tasks who meet the qualifications specified in paragraph (c) or (d).	SFB
2505.09(g)	No customer-sited source or source producing useful thermal energy shall use an independent monitor: <ul style="list-style-type: none"> • who is a member of the immediate family of the owner of the source, or, • who holds a direct or indirect ownership interest in the source, or, • who sold or installed the equipment used by the source. 	SFB
2505.09(h)	The fact that a provider of electricity installed the customer-sited source or source producing useful thermal energy shall not be a disqualifying relationship.	SFB
2505.09(i)	<i>The duties of the independent monitor shall be:</i>	Initials
2505.09(i)(1)	To perform an initial inspection of source's meter 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 <u>Puc 305</u> .	
2505.09(i)(2)	To measure quarterly the source's electricity or useful thermal energy production or displacement used to qualify for certificates pursuant to the GIS operating rules.	SFB
2505.09(i)(3)	To report the production of electricity or useful thermal energy from the source and the REC calculation to the customer and the GIS quarterly in accordance with the GIS operating rules.	SFB
2505.09(j)	An independent monitor shall not receive compensation for monitoring services that is a function of the number of certificates issued to any source using the independent monitor.	SFB
2505.09(k)	An independent monitor shall provide the commission with the notice prior to discontinuing services as a monitor.	SFB

Describe your rates for Renewable Energy Source Eligibility for Independent Monitoring (add lines as needed).

Description:	Unit	Rate
	Per hour	\$
	Flat fee	\$
	Annual	\$
Residential automated reporting for five years.	5 Years	\$150
Commercial automated reporting for five years.	5 Years	\$450

AFFIDAVIT


The undersigned applicant declares under penalty of perjury that contents of this application are accurate.

Applicant's Signature  Date 5/18/16

Applicant's Typed Name Sam Barnard

Subscribed and sworn before me this 18th Day of May (month) in the 2016 year

County of San Francisco State of California



Notary Public/Justice of the Peace

My Commission Expires 11-13-17

