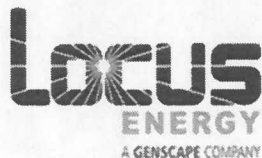


NHPUC 12SEP16PM1:07



September 1, 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 and other rules provisions, pursuant to PUC 201.05

Dear Ms. Howland,

I am writing on behalf of Locus Energy, a prospective RPS independent monitor for New Hampshire, to petition that a rule waiver be granted for PUC 2505.09(i)(1), the On-Site REC Meter Inspection Requirement for Independent Monitors, as well as PUC 2505.09(g) and PUC 2505.09(a), pursuant to Puc 201.05.

PUC 2505.09(i)(1)

Locus Energy is requesting a rule waiver for the PUC 2505.09(i)(1) on-site inspection 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 where it is installed. 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 be waived.

PUC 2505.09(a)

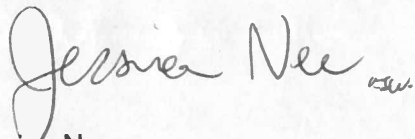
Locus Energy is requesting a rule waiver for PUC 2505.09(a) where "a customer-sited source or source producing useful thermal energy shall retain the services of an independent monitor directly". Locus Energy provides monitoring of the remote electronic system, as well as the concurrent reporting services, as part of the package the installer purchases from Locus Energy with our revenue grade meters, which is installed as part of the complete PV system. As such, Locus Energy's independent monitoring commitment is provided to the facility owner via the originally installed purchased package, and includes no extra charges to the facility owner for the service. The typical monitoring and reporting commitment is five years. At the end of the initial commitment, the facility owner is able to execute a new agreement to extend independent monitoring services with Locus Energy.

PUC 2505.09(g)

Locus Energy is requesting a rule waiver for PUC 2505.09(g) where "No customer-sited source or source producing useful thermal energy shall use an independent monitor...who sold or installed the renewable energy system and associated equipment". Locus Energy sells revenue grade meters to installers who include them in the installed PV system. Locus Energy, as an independent monitor, has no vested interest in the production of Renewable Energy Certificates (RECs) from any monitored renewable energy resource, and hold that a Locus Energy meter installed as part of an overall PV system for a facility owner will not compromise Locus Energy's ability to independently execute remote production monitoring and reporting functions.

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 cursive script that reads "Jessica Nee". To the right of the signature, there is a small, faint handwritten mark that appears to be "JN".

Jessica Nee
Vice President, Fleet Operations
Locus Energy