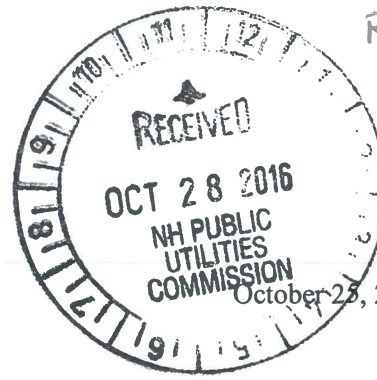




Debra A. Howland
Executive Director
State of New Hampshire Public Utility Commission
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429



REC 16-727

Re: Application to Qualify as an Independent Monitor - New Hampshire

Attached is SolarEdge Technologies' application to qualify as an independent monitor for the State of New Hampshire.

About SolarEdge

SolarEdge is a market leader in photovoltaic inverters for residential systems in North America. To date, SolarEdge has provided renewable energy production verification and reporting services in the state of Massachusetts and is looking to extend this service to additional NEPOOL states.

The SolarEdge solution automatically collects data from revenue grade meters installed on each site and reports production data directly to a production tracking system (NEPOOL GIS in this case).

In addition, SolarEdge has remote servicing capabilities, field teams, and a call center in the US to provide support to installers and home owners.

Request for Waiver

I am writing this letter in order to request a rule waiver from the following:

1. Puc 2505.09(i)(1): 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:
 - a. SolarEdge sells inverters with integrated revenue grade meters; the meter and inverter are assembled together at production line and are tested and validated. The revenue grade meter reports the energy readings to our monitoring platform which will then send reports to NEPOOL GIS.
 - b. SolarEdge can do an ongoing validation by comparing meter data with a secondary data source such as the energy production values from the inverter.

You will notice I have not initialed this item because we will not be able to fulfill that requirement if it is to be interpreted as requiring an on-site inspection. Therefore I request that you waive this requirement.

2. Puc 2505.09(g): No customer-sited source or source producing useful thermal energy shall use an independent monitor who is a member of the immediate family of the



owner of the source, holds a direct or indirect ownership interest in the source, or who sold or installed the renewable energy system and associated equipment:

- a. SolarEdge sells PV inverters with integrated revenue grade meters through distributors and installers; we do not sell directly to property owners.
- b. The SolarEdge Revenue Grade Certified (ANSI 12.20) is integrated with the SolarEdge PV inverter.
- c. SolarEdge is currently certified for reporting by PTS, NEPOOL GIS, GATS and CT Green Bank.

I have not initialed this item because the SolarEdge inverter has a fully embedded revenue grade meter. However, since SolarEdge sells through distributors there is no conflict of interest and I request that you waive this requirement.

3. Puc 2505.09(a): An independent monitor shall verify the electricity production of a customer sited source or the production of useful thermal energy from an eligible source and report such production and REC calculation to the GIS. A customer-sited source or a source producing useful thermal energy shall retain the services of an independent monitor directly:
 - a. The SolarEdge system reports energy generation through a meter which does not involve the receipt of information from SolarEdge customers (direct or in-direct customers including installers and system owners).
 - b. Our solution includes independent energy reading from both power optimizers and inverters. We can use our products to perform one-time or ongoing data validation in order to remotely determine the accuracy of the meter data reading.

I want to highlight that I have also not initialed this item since the SolarEdge RGM is integrated with the SolarEdge inverter. The customer is not involved in the energy production reporting process and therefore SolarEdge cannot fulfill the requirement of verifying a customer sited source. I request that you waive this requirement.

In summary I would like request that you waive the items referenced in the above mentioned regulations and hence I have not initialed these items. I believe that the growing base of installed renewable energy systems in New Hampshire, and other locations in the US, coupled with newly available intelligent automation processes should be able to adequately replace some of the previously required manual steps.

Please don't hesitate to contact us at any time if any further clarifications are required. Thank you for your consideration.

Sincerely,



Ronen Ezer, CFO

SolarEdge Technologies, Inc.