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

December 11, 2016

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

We are 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 fully integrated meters that are ANSI C12.20 certified, +/- 0.5% accuracy, and revenue grade. The meters are specifically for remote monitoring and are installed at the same time as other solar PV equipment including PV panels. All SolarEdge inverters with integrated revenue grade meters include remote electronic system production monitoring and reporting services when sold and installed together with a complete PV system. The SolarEdge monitoring portal is provided at no additional cost for the life of the system. 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. SolarEdge technical support can be available by phone if an installer has a question about meter data validation in the course of installation.

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- b. The purpose of this rule is to ensure that the SolarEdge meter for every customer sited source of renewable energy is accurate. The on-site inspection is intended to confirm that the SolarEdge meter has been installed properly and to verify that the data provided to NEPOOL-GIS will be accurate. The purpose of the rule can be satisfied by alternative methods. SolarEdge has the ability to accomplish these assurances through electronic communication without doing an on-site inspections. The meter and the inverter are assembled together on a production line and are tested and validated. The SolarEdge meters will begin reporting to the SolarEdge Monitoring Portal through cellular or LAN connection once the inverter is installed. Each inverter is assigned a unique serial number which the installer or developer is required to enter when registering the inverter and location in the SolarEdge Monitoring Portal. We are assured of proper installation once the meter appears in the SolarEdge monitoring portal and begins reporting. The SolarEdge Monitoring Portal detects system anomalies and notifies the installer of any system faults.
- c. SolarEdge is able to continually conduct reasonable data validation with the expected power generation through satellite weather data and through site clustering.

You will notice we 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 we 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) Meter is integrated with the SolarEdge PV inverter.
 - c. SolarEdge is currently certified for reporting by PTS, NEPOOL GIS, GATS and CT Green Bank.
 - d. SolarEdge reports yield data from the Revenue Grade Meter as an independent agent from its customer base (installers and home owners). SolarEdge has a vested interest in metering reporting and data accuracy which creates independence from the vested interest that installers and home owners may have.

we have not initialed this item because we have sold the inverter to the site owner (via distribution). However, as explained, since SolarEdge sells through distributors there is no conflict of interest and we 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.

We want to highlight that we have also not initialed this item since the SolarEdge meter 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. We therefore request that you waive this requirement.

In summary we would like to request that you waive the items referenced in the above mentioned regulations and hence we have not initialed these items. We 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,

A blue handwritten signature, appearing to read "Ronen Faier", written over a blue ink scribble.

Ronen Faier, CFO

SolarEdge Technologies, Inc.