

PUC 19DEC16AM10:56

December 15, 2016

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

RE: Independent Monitor Application and Request Rule Waiver for **PUC 2505.09(i)(1)**, **PUC 2505.09(g)** and **PUC 2505.09(a)**

Dear Ms. Howland,

AlsoEnergy is an independent performance monitoring provider and reporting service provider seeking to qualify as an independent monitor for the State of New Hampshire. AlsoEnergy delivers comprehensive top-tier monitoring and control solutions for a variety of technologies, with a focus on solar PV monitoring. Our remote solar monitoring software provides definitive performance insights for PV systems using sophisticated performance modeling. Currently, AlsoEnergy is reporting data to 11 U.S. incentive-based programs with our monitoring solution. In regards to NEPOOL GIS, AlsoEnergy is currently reporting data as an independent monitor for projects in Massachusetts, Connecticut, Vermont, and Rhode Island.

AlsoEnergy works closely with the contracted installer and/or the end user to integrate our data acquisition system (DAS) in order to monitor and report production data to responsible agencies such as NEPOOL GIS. The DAS we provide includes metering equipment and software which is integrated with the PV system installation. Although AlsoEnergy sells equipment to be used in conjunction with the PV system, by no means do we hold a direct or indirect ownership in the renewable energy source. Also Energy employs only revenue-grade meters provided by qualified suppliers and are provided calibration certificates upon receipt and those certificates are uploaded to the monitoring website and remain there in perpetuity. Once the equipment is installed by the installer and the system comes online, AlsoEnergy requires the O&M's onsite technician to contact AlsoEnergy Support in order to perform an inspection so AlsoEnergy may certify the site. During this validation process, AlsoEnergy confirms the location of the installed DAS via the Datalogger Serial Number/MAC ID and performs standardized diagnostics with the onsite technician to ensure equipment is installed correctly and data is valid. Data reporting to NEPOOL GIS will not commence until the site has been AlsoEnergy certified, and the meter is sending proper data. AlsoEnergy has no financial interest and receives no compensation in Renewable Energy Certificates (RECs) generated by any source using AlsoEnergy as the independent monitor. AlsoEnergy shall not receive compensation for monitoring services that is a function of the number of certificates issued to any source using its independent monitoring and reporting services.

In regards to actual data reporting to NEPOOL GIS, our software has an automated reporting feature which detects anomalies in revenue grade production meter kWh data. In the event there is an anomaly, AlsoEnergy has a dedicated reporting and support team to review and verify data prior to submitting to NEPOOL GIS.

AlsoEnergy is requesting the following specific rules be waived: PUC 2505.09(i)(1), which requires an initial inspection; PUC 2505.09(g), which prohibits independent monitors who sell equipment associated with the renewable energy system; and PUC 2505.09(a), which requires a customer-sited source to retain services of an independent monitor directly.

**PUC 2505.09(i)(1)**

AlsoEnergy is requesting specific rule "To perform an initial inspection of source's meter for accuracy and capability to measure the electricity or useful thermal energy produced" to be waived. As before mentioned, we require the O&M's onsite technician to contact our support team so we may certify and validate meter data for the site. Our monitoring software solution allows us to validate meter data as soon as the system comes online which we can do without an onsite inspection by AlsoEnergy.

**PUC 2505.09(g)**

AlsoEnergy is requesting specific rule "*No customer-sited source or source producing useful thermal energy shall use an independent monitor...who sold the equipment used*" to be waived. We are confident our monitoring and reporting services are not effected by us selling equipment associated with the renewable energy system. A key aspect to our ability to provide accurate, reliable monitoring and reporting services is due to our experience in providing robust equipment that we know works. AlsoEnergy practices independent monitoring and as before mentioned, has no direct or indirect ownership with any source.

**PUC 2505.09(a)**

AlsoEnergy is requesting specific rule "*Such a customer-sited source or a source producing useful thermal energy shall either retain the services of an independent monitor directly*" to be waived. AlsoEnergy provides agency reporting service for a term of 5 years for a flat fee of \$400 as a part of the order the contracted installer and/or system owner purchases from AlsoEnergy. We are committed to deliver 60 monthly reports to NEPOOL GIS. At the end of the term, AlsoEnergy offers the system owner a renewal of monitoring and reporting services with AlsoEnergy.

Thank you for taking the time to consider our application. Please let us know if there are any questions.

Sincerely,



Yeekeng Vue  
Agency Reporting Program Manager  
AlsoEnergy



## 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](mailto:executive.director@puc.nh.gov) and [barbara.bernstein@puc.nh.gov](mailto: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:	Yeekeng Vue		
Business Name:	AlsoEnergy		
Mailing Address 1:	5425 Airport Blvd		
Mailing Address 2:	Ste. 100		
Town/ City:	Boulder	State:	CO      Zip Code: 90301
Telephone:	(866) 303-5668	Cell:	n/a
email	reporting@alsoenergy.com		

<b>2505.09</b>	<b>Independent Monitors</b>
2505.09(a)	An independent monitor shall verify the <u>electricity</u> production 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.
2505.09(b)	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).

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.

<b>Electrical Production Independent Monitors</b>	
2505.09(c)	To qualify as an independent monitor who verifies <b>electrical production</b> please indicate which of the following apply to the applicant:
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"/>

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

<i>Provide your initials as an indication that you have read the following as it pertains to Independent Monitors and agree to uphold the rule.</i>		<b>Initials</b>
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.	
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).	<b>YV</b>
2505.09(g)	No customer-sited source or source producing useful thermal energy shall use an independent monitor: <ul style="list-style-type: none"> <li>• who is a member of the immediate family of the owner of the source, or,</li> <li>• who holds a direct or indirect ownership interest in the source, or,</li> <li>• who sold or installed the equipment used by the source.</li> </ul>	
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.	<b>YV</b>
2505.09(i)	<i>The duties of the independent monitor shall be:</i>	<b>Initials</b>
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 <a href="#">Puc 305</a> .	
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.	<b>YV</b>
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.	<b>YV</b>
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.	<b>YV</b>
2505.09(k)	An independent monitor shall provide the commission with the notice prior to discontinuing services as a monitor.	<b>YV</b>

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

Description:	Unit	Rate
	Per hour	n/a
Agency Reporting Services for a period of 5 years	Flat fee	\$400
	Annual	n/a

**AFFIDAVIT**

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

Applicant's  
Signature

*Yeekeng Vue*

Date

12/15/16

Applicant's Typed  
Name

Yeekeng Vue

Subscribed and sworn before me  
this

15<sup>th</sup>

Day  
of

December (month) in the  
year

2016

County of

~~Boulder~~ Adams

State of

Colorado

*[Signature]*

Notary Public/Justice of the Peace

My Commission Expires

5/13/18

CINDY J. TELLO  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 20144018915  
MY COMMISSION EXPIRES 05-13-2018