



Renewable Energy Development Associates LLC  
533 Congress Street  
Portland, Maine 04101

NHPUC DEC05'16 PM 2:01

5 December 2016

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 0330 1-2429

Dear Ms. Howland:

Please find herein request for a limited waiver of PUC rule 2507.02(a), given that:

- a. PUC 2505.09 establishes the Independent Monitor in the function of assuring that renewable energy generation data are accurate and of a grade valid for revenue purposes (i.e. ANSI metering accuracy standards) before being reported to the Nepool-GIS.
- b. The current REC Aggregator application (rev. date 3/1/16) states there must be full disclosure of any personal or business relationship existing between aggregator and independent monitor.

Waiver is requested of for portions of PUC Rules 2507.02(a), which states:

An aggregator shall not aggregate certificates from a customer-sited source or a source producing useful thermal energy if the aggregator has a prohibited relationship to an independent monitor, equipment manufacturer, *equipment installer* or owner associated with the source.


Operating solar PV facilities have already been vetted for electrical code conformance with local inspection, interconnection standards required by the grid operator, and are simply filing proof of regulatory conformance with the PUC. The measurement of our solar generation is done by a state-certified Independent Monitor, who reports these figures into the Nepool-GIS.

REDA believes that there is an overlap and efficiency between the registration of solar systems for REC sales, and monitoring the system's general performance for efficiency and operations. This is a benefit to us for tracking performance and to the customer in not having to juggle paperwork between several different parties. Furthermore, we believe that additional aggregation services provided to the state market will benefit customers in the form of increased competition and more favorable pricing.

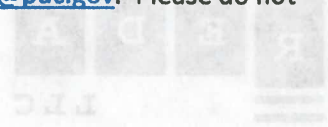
Therefore, we respectfully request a limited waiver of PUC Rules 2507.02(a) to allow REDA, a solar equipment installation company (state business ID: 730900), to act in the capacity of aggregator of Renewable Energy Certificates under the NH RPS market.

Electronic version of this correspondence has been sent to [executive.director@puc.gov](mailto:executive.director@puc.gov). Please do not hesitate to contact me if you have any questions regarding the applications.

Sincerely,



Will R. Kessler  
NABCEP Cert #032611-169  
Business Development Manager  
207-232-7327



2 December 2016

Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 20  
Concord, NH 03301-2428

Dear Ms. Howland:

Please find herein request for a limited waiver of PUC rule 2507.02(a), given that:

a. PUC 2502.09 establishes the Independent Monitor in the function of assuring that renewable energy generation data are accurate and of a grade valid for revenue purposes (i.e. WYST metering accuracy standards) before being reported to the Netpool-GIS.

b. The current REC Aggregator application (rev. date 3/1/16) states there must be full disclosure of any personal or business relationship existing between aggregator and independent monitor.

Waiver is requested of the portions of PUC Rules 2507.02(a), which states:

An aggregator shall not aggregate certificates from a customer-sited source or a source producing useful thermal energy if the aggregator has a prohibited relationship to an independent monitor, equipment manufacturer, equipment installer or owner associated with the source.

Operating solar PV facilities have already been vetted for electrical code conformance with local inspection, interconnection standards required by the grid operator, and are simply filing proof of regulatory conformance with the PUC. The measurement of our solar generation is done by a state-certified Independent Monitor, who reports these figures into the Netpool-GIS.

REDA believes that there is an overlap and redundancy between the registration of solar systems for REC sales, and monitoring the system's general performance for efficiency and operations. This is a benefit to us for tracking performance and to the customer in not having to juggle paperwork between several different parties. Furthermore, we believe that additional aggregation services provided to the state market will benefit customers in the form of increased competition and more favorable pricing.

Therefore, we respectfully request a limited waiver of PUC Rules 2507.02(a) to allow REDA, a solar equipment installation company (state business ID: 330900), to act in the capacity of aggregator of Renewable Energy Certificates under the NH RPS market.