

December 16, 2016

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

NHFUC 19DEC'16 PM 12:02

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

Attached is Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) application to qualify as an independent monitor for the State of New Hampshire.

Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) is a market leader in photovoltaic inverters for residential systems in North America. To date, Yaskawa – Solectria Solar is already providing renewable energy production verification and reporting services in the state of Massachusetts and looking to extend this service to additional NEPOOL states.

Our solution is based on automatic data collection from revenue grade meters which are installed on site and are reporting production data directly to a production tracking system (NEPOOL GIS in this case).

We are writing this letter in order to request a waiver from the following items:

2505.09(i)(1)

An Independent Monitor is required to “perform an initial inspection of source’s meter for accuracy and capability to measure the power produced...”.

From our experience remote meter reading is as accurate as on-site inspection. Our solution includes independent energy reading from both Revenue grade meters and inverters. Dataloggers are used to communicate with the Meter directly. The datalogger then uploads data so that we can monitor/track the energy production. 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. Our internal inventory tracks the Meter with datalogger macID and/or Meter serial numbers, model type, as well as site location and system size. Typically, when new system first connects, our service staff updates the site’s monitoring configurations to include the devices and their information. Moreover, since Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) is a corporation and not an individual it would be extremely difficult to perform on-site inspections in each of the systems where our revenue grade meters are installed. We would therefore like to ask you to consider waiving the item referencing 2505.09(i)(1) and hence we have not initialed this item. 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.

PUC 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.

Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) provides remote monitoring of revenue quality meters. Data for these meters are used for Revenue reporting (such as NEPOOL GIS). The typical

initial monitoring/reporting package, that includes the monitoring and reporting services, is 5 years. At the end of that period, the customer can extend monitoring/reporting services by renewing those services (5-year service is \$220 for Residential, \$750 for Commercial).

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, or,
- who holds a direct or indirect ownership interest in the source, or,
- who sold or installed the equipment used by the source.

Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) sells revenue quality meters to installers/distributors to be included as part of the system's Revenue grade monitoring package. Compensation for monitoring services is not based on the quantity of RECs produced or a percentage of REC sales proceeds. Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) has no vested interest in the site owner's REC credits, and the monitoring/reporting service is done independently.

Please don't hesitate to contact us at any time if any further clarifications are required.

Thank you for your consideration.

Sincerely,



Anita Worden

CEO

Solectria Renewables, LLC's (dba Yaskawa Solectria Solar)

+1 (978) 683-9700

anita.worden@solectria.com



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 and 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:	Anita Worden					
Business Name:	Solectria Renewables, LLC.					
Mailing Address 1:	360 Merrimack Street Building 9, 2nd Floor					
Mailing Address 2:						
Town/ City:	Lawrence	State:	MA	Zip Code:	01843	
Telephone:	978-683-9700 ext 128	Cell:				
email	Anita.worden@solectria.com					

2505.09	Independent Monitors
2505.09(a)	<i>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.</i>
2505.09(b)	<i>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).</i>

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.

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

Useful Thermal Energy Independent Monitors		
2505.09(d)	<i>To qualify as an independent monitor who verifies useful thermal energy production please indicate which of the following apply to the applicant:</i>	
2505.09(d)(1)	A professional engineer licensed by the State of NH and in good standing.	<input type="checkbox"/>
2505.09(d)(2)	<i>For verification of useful thermal energy from solar thermal sources, a North American Board of Certified Energy Practitioners (NABCEP) Certified Solar Heating Installer</i>	<input type="checkbox"/>
2505.09(d)(3)	<i>For verification of useful thermal energy from geothermal sources an International Ground Source Heat Pump Association (IGSHPA) Accredited Geothermal Installer</i>	<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>		Initials
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.	AW
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).	AW
2505.09(g)	No customer-sited source or source producing useful thermal energy shall use an independent monitor: <ul style="list-style-type: none"> • who is a member of the immediate family of the owner of the source, or, • who holds a direct or indirect ownership interest in the source, or, • who sold or installed the equipment used by the source. 	AW
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.	AW
2505.09(i)	<i>The duties of the independent monitor shall be:</i>	Initials
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 <u>Puc 305</u> .	[waive]
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.	AW
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.	AW
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.	AW
2505.09(k)	An independent monitor shall provide the commission with the notice prior to discontinuing services as a monitor.	AW

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

Description:	Unit	Rate
	Per hour	\$
	Flat fee	\$
	Annual	\$
1-phase (Residential) reporting (5 Years)	5 Years	\$ 220.00
1-phase (Residential) reporting (10 Years)	10 Years	\$ 280.00
3-phase (Commercial) reporting (5 Years)	5 Years	\$ 750.00
3-phase (Commercial) reporting (10 Years)	10 Years	\$1100.00

AFFIDAVIT

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

Applicant's Signature *Anita Worden* Date 11/18/2016

Applicant's Typed Name Anita Worden

Subscribed and sworn before me this 21st Day of November (month) in the year 2016

County of Lawrence State of MA

Cheryll A. Hughes
 Notary Public/Justice of the Peace
 My Commission Expires Feb 3, 2023


