

April 4, 2017

NHPUC 10APR'17PM2:57

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

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 currently provides renewable energy production verification and reporting services in the state of Massachusetts and looking to extend this service to additional NEPOOL states. Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) is currently certified for reporting to PTS, NEPOOL GIS, CSI, IID.

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:

PUC 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 to our servers (either using on-site internet or cell connection) 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. Data from revenue quality meters can also be regularly validated either by live on-site reading or remotely comparing data with expected production readings for the site.

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.

Our customer service staff is available by email/phone whenever there's an issue or if we need to validate data/installation.

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. A customer-sited source or a source producing useful thermal energy shall retain the services of an independent monitor directly.

Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) provides remote monitoring of revenue quality meters. Data from 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.
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- Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) sells revenue quality meters to installers/distributors to be included as part of the Solrenview 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.
 - Revenue quality meters must meet [NEPOOL GIS Minimum Meter Requirements](#). Meter accuracy is tested/certified by meter manufacturers. All monitoring parts are purchased with 1-year warranty.
 - 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.
 - Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) is currently certified for reporting to agencies including PTS, NEPOOL GIS, CSI (PGE, SCE, CCSE), IID.

In summary, we request that the Commission waive the items referenced in the above mentioned regulations. Solectria Renewables, LLC's (dba Yaskawa Solectria Solar) believes 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,



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