

50 Cliff St.
South Royalton, VT 05068

NH PUC
21 South Fruit Street
Suite 10
Concord, NH 03301



Re: PUBLIC COMMENT ON THE C&I REBATE PROGRAM

To Whom It May Concern:

ReKnew Energy Systems, Inc. hereby submits this public comment related to solar energy systems. ReKnew is a solar design/build company located in South Royalton, Vermont. At least half of our clients are located in New Hampshire, therefore this program will significantly affect our operations. Our New Hampshire clients include residences, schools, municipalities, commercial entities, and industries.

We are submitting comment on Section 5 (Rebate structure and amount): “Commission is considering setting aside a portion of the PV allocation for larger installations than this cap might fund and seeks comment on the merits of such a set-aside...”

We think it is critical to the success of your program to fund projects larger than 100 kW. Projects over 100 kW should still be eligible to receive the \$50,000 maximum rebate (or more). Large industrial and commercial entities may want to install enough PV to wipe out their electric bills entirely, and this requires large PV systems.

We recognize that some entities intend to install systems that are larger than necessary in order to profit from the excess free electricity production. If the 100 kW cap is intended to discourage these types of profit-oriented installations, then perhaps an alternate solution would be to set a percentage production level for projects over 100 kW. In this case you might say that projects over 100 kW cannot produce more than 95% of the total associated building demand.

If you would consider setting aside some portion of the PV allocation for systems over 100 kW, then you could allocate the funds based on a lottery. You could accept preliminary applications over a period of time in order to assess how many entities are immediately interested in getting some rebate. Maybe you could fund 3-10 projects over 100 kW. You could hold a lottery for those preliminary applicants in order to determine who gets funded (and set up a waiting list for the others); projects that are not commenced within 6 months (or some sufficient time period) forfeit their rebate and the next applicants move up the list. This would be similar to the feed in tariff lottery in Vermont.

Regardless of the process, we strongly recommend that systems over 100 kW be considered for *some* rebate. We're happy to see that you are finally offering a commercial rebate and expect it will be very popular. Feel free to contact our commercial projects manager, Steve Tofel, with questions or a response (information at footer).

Thank you,

ReKnew Energy Systems, Inc.