

September 1, 2010

Debra A. Howland  
Executive Director  
NH Public Utilities Commission  
21 South Fruit St.  
Concord NH 03301

**Re: ACT Bioenergy, LLC Comments on DE 10-212 Commercial and Industrial Renewable Energy Rebate Program**

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Dear Executive Director Howland,

Thank you for the opportunity to comment on DE 10-212. ACT Bioenergy, LLC is a manufacturer of high-efficiency, clean-burning, commercial-scale wood pellet and wood chip boiler systems based in Schenectady, NY. We have a representative office in Plymouth, NH.

We support the Commission to establish a commercial and industrial renewable energy rebate program that includes high-efficiency biomass heating and other renewable technologies and not only solar thermal and PV technologies. We believe this is consistent with the intent of the RSA 362-F:10 Statute.

In terms of cost per dollar invested to replace fossil fuel use and to reduce carbon emissions, biomass heating is one of the lowest cost technologies per unit energy produced and modern high-efficiency systems, especially those that burn pellets, have exceptionally low emissions. Therefore we believe that expanding the eligible renewable technologies will avoid the PUC having to pick "winners" and will instead allow the market to determine the most cost effective allocation of resources. We recommend that the program should be evaluated based on environmental and economic performance and to develop a program which funds projects based on competitive evaluation of the cost to reduce energy, carbon dioxide and other pollutants simultaneously. This performance could relatively easily be verified by a post installation energy audit.

We ask the PUC to adopt a final commercial and industrial renewable energy rebate program that recognizes any qualifying technology including biomass boilers. We support the rebate structure as proposed in section 5 of the notice for technologies with electric energy output. We support the rebate structure and a cap of 25% of the cost of the facility or \$50,000, whichever is less for any approved technology with thermal output. We support the requirement of an energy audit in order to qualify for consideration, as well as the other requirements of section 6.

We believe it is important that the PUC establishes incentive and rebate programs that do not pick technology winners and losers, but equitably recognize all renewable energy technologies that fulfill the objectives of the enabling statutes. We believe that this will result in the most cost-effective achievement of our joint energy and environmental goals.

Sincerely,



David Dungate, M. Eng  
President  
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