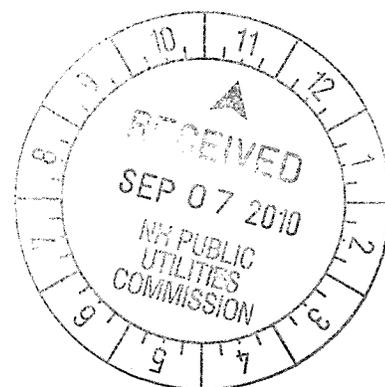


New Hampshire State Senator
Jeb Bradley
630 South Main Street
Wolfeboro, New Hampshire 03894

September 3, 2010

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street Suite 10
Concord, New Hampshire 03301-2429



Re: DE 10-212 Establishing A Commercial and Industrial Renewable Energy Rebate Program

Dear Ms. Howland:

Thank you for the opportunity to submit comments on the Public Utilities Commission Staff's proposal for a Commercial and Industrial rebate program for solar photovoltaic installations and solar hot water systems. Please accept this electronic version with a hard copy to follow.

As the Public Utilities Commission is well aware, the Legislature spent a considerable amount of time and effort this past legislative session working to clarify the Renewable Portfolio Standards statute in order to broaden the scope of the Renewable Energy Fund beyond its uses so far which have included residential solar and a limited amount of residential wind applications.

The specific intent of Chapter 254 requires that both the residential and nonresidential sectors have a balanced allocation of funding from the Renewable Energy Fund, while also ensuring that all types of renewable energy, including resources such as wind, hydro, wood, and solar, have an equal opportunity to compete for funds through a request-for-proposals process.

There were several public hearings on HB-1270 (Chapter 254) and Legislators in both the House and Senate heard compelling testimony from a broad range of stakeholders, including environmental advocates, the forest products industry, businesses, different types of renewable generators, and customers that it is critical to have an open, transparent and competitive approach to allocating money from the Renewable Energy Fund. Chapter 254 requires that monies distributed from the Renewable Energy Fund must be done through a competitive process that is open to all prospective participants. A request-for-proposal process will not only cast the widest possible net for technologies, but will also allow the private sector to put forth innovative

proposals that maximize use of the Fund. As you know, Chapter 254 specifically requires the Commission to issue request-for-proposals by March 1 of 2011 and annually thereafter.

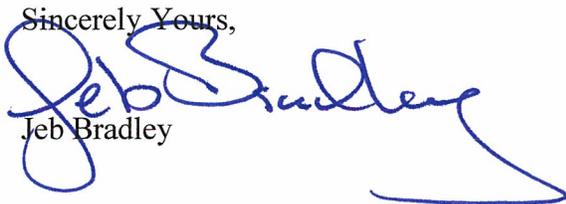
In my view the Legislature amended RSA 362-F in order to assure New Hampshire electric customers' hard-earned dollars are being spent in the most cost-effective ways possible, as well as to assure that all technologies and all participants have the same opportunities to compete for proceeds of the Renewable Energy Fund.

I do not believe that the proposed Commercial and Industrial rebate program, which would give government-set rebates to just one type of renewable energy, namely solar, is consistent with the changes to RSA 362-F established by Chapter 254 ---- unless it occurs through the request-for-proposal process. It may well be that the proposed Commercial and Industrial rebate program designed by Commission Staff will be chosen through a request-for-proposal process. But to make that determination prior to issuance of requests-for-proposals is not consistent with Chapter 254, nor consistent with the goals the Legislature sought to establish of transparency, competition, efficiency, cost effectiveness, and equal opportunity for all renewable energy technologies.

With a fresh injection of more than \$1.3 million into the Renewable Energy Fund this past July, it is incumbent upon the State to ensure that this money is being spent wisely while implementing New Hampshire's goals of enhancing renewable power and reducing air pollution. I strongly encourage the Commission to abide by Chapter 254 and establish the request-for-proposal process.

Thank you for your consideration of these comments.

Sincerely Yours,

A handwritten signature in blue ink that reads "Jeb Bradley". The signature is stylized and cursive, with a long horizontal flourish extending to the right.

Jeb Bradley