



SOLAR SOURCE

353 West Street - PO Box 523, Keene, NH 03431 ~ (603) 352-4232 Fax (603) 352-5375
www.SolarSourcesite.com

Executive.director@puc.nh.gov

Subject: DE 10-212 Establishing a Commercial & Industrial Renewable Energy Rebate Program comments.

Please consider our input into this matter as a NH firm with over three years in the local solar design and installation industry.

We support this much needed addition to the encouragement of the market for clean, renewable energy systems. It will make the NH renewable incentive program more balanced and will create significant economic activity for local firms. We suggest reconsideration of the Program name since we are aware of a number of non-profit organizations that are interested in solar systems which will be encouraged and supported by this Program.

Due to the limited funds for this program, it should focus on the most reliable and viable technologies PV and solar thermal.

The suggestion that an energy audit be performed is commendable except that it creates another hurdle for the business to overcome in acquiring a renewable energy system. There may be a lack of qualified commercial and industrial energy auditors in some areas; this would make this requirement an impediment to the program. Audits should be recommended but be optional as they are for the residential program. The suggestion that "some...measures" be installed is vague and arbitrary. It discounts any measures that have been taken independent of an audit or in prior years. This should not be a requirement for the Program.

The systems should be subject to shade analysis and be code compliant and include similar criteria as the residential rebates. In the interests of consistency and simplicity the forms should be similar to or better yet integrated into one reservation form and one final application form with separate sections for residential and C&I specifics as needed.

Since these funds are quite limited, I think they are inadequate to include larger systems. Systems larger than 50 KWP should not be included until additional funds become available. Solar systems are modular and adaptable to many sites such as existing roofs or the northern edges of fields in discrete sizes with minimal aesthetic impacts. Unlike large power systems these small systems can be installed in days and avoid the environmental impact assessments needed for large power stations. Based on several studies there is minimal economy of scale from multi-KW to MW sized PV systems based on \$/WP. Bigger is not always better and small, dispersed systems are more consistent with our values of independence and scenic beauty.



The State's objective should be to encourage widespread participation in order to encourage the growth of a healthy renewable energy industry. It's possible that as few as 35 systems might be installed under the current proposal. The cap per installation should be set low enough to insure the funds will be available for a significant number of systems per year. By reducing the cap to \$30,000 more systems would be installed supporting more companies both customers and solar professionals. To this end we also suggest the structure be modified to include at least two phases in order to avoid all of the funds being committed at once. For example:

Phase 1- expires when 50% of the funds have been reserved.

<u>Tier</u>	<u>Rebate/Watt</u>
1 st 10 kw	\$1.25
10-50 kw	1.00

Phase 2- for balance of funds until all have been reserved.

<u>Tier</u>	<u>Rebate/Watt</u>
1 st 10 kw	\$1.00
10-50 kw	0.75

Having worked in both the contractor and manufacturing sectors during the last solar boom in the late 1970's and 80's I hope we can avoid the mistakes made then. The incentives should be consistent so as to encourage the development of a vibrant industry. They should not be changed frequently or create brief spikes in demand where the funds are consumed quickly leaving long periods of time with no incentives. The incentives should be reasonable and sustainable for at least full year increments with funding replenished in a consistent and predictable manner. High standards should be required since these are systems that should last for decades if installed properly.

Thank you for your consideration, we hope this input is of value and supports the development of a viable and sustainable renewable energy industry in our state.

With wishes for sunshine, success and good health,

John Kondos
Solar Source
The Melanson Co.
353 West St
Keene, NH 03431
603-352-4232 x274
www.SolarSourceNE.com

cc : Senator Molly Kelly, Richard Ober, Jack Ruderman