

-----Original Message-----

From: Stephen Hagerman [mailto:steve@nashuawebsolutions.com]

Sent: Friday, June 05, 2009 11:41 AM

To: Ruderman, Jack

Subject: Comments - Draft Incentive Application for Installed Residential small Renewable Electric systems

Mr. Ruderman;

After reading the revised Draft Incentive Application for Installed Residential small Renewable Electric systems, I would like to make the following comments:

1. Under Section C (System Information) for a photovoltaic system, numbers 4, 5, and 6 make the assumption that all panels are identical and produce the same power. While normally this is correct, it does not hold true for all systems. My system does include one panel of a different power rating from the others.
2. Section D (Attachments Required), Number 2 asks for an invoice by item and item cost. This is information that a person who bought a turn key system would not have access to. I believe this requirement should be reworded so as to require only people who installed systems themselves to provide this information.
3. Section D (Attachments Required), Number 4 asks for authorization to interconnect from your electric utility. Authorization to interconnect was given to me verbally, and I am in possession of no document other than the authorization to interconnect that was signed and returned to me by a representative of the electric utility. Having read the other comments, this seems to be standard practice. I would request that the PUC remove this requirement as it would require some, if not all applicants to request a letter from their electric utility, further delaying their applications.
4. Appendix A, Number 2 states "It is the expectation of the Public Utilities Commission (PUC) that any system receiving an incentive under the program will be maintained and remain operational at the listed site for a period of at least ten (10) years". It is unclear to me what obligations this puts on the person receiving the incentive payment. For example, if the property to which a system is attached is sold, does an obligation then fall on the new owner of the property? There are also situations that could arise where the operation of the site could be affected by factors not under the control of the applicant. For example a neighbors' tree could block sunlight to a photovoltaic array, or new construction could affect the performance of a wind turbine. As it is already in the applicants' interest to keep the system maintained, so as to have the best performance possible, I believe this amendment to be unnecessary.
5. Appendix A, Number 6 states "Incentives are subject to the availability of funds through the PUC. If requests exceed available funds, the PUC will create a waiting list with priority given to complete and accurate applications by the date received". I would request that the PUC reconsider the priority of the waiting list. When the PUC begins accepting applications, there will be a backlog of almost 1 year of applicants. Distributing funds on a "first come, first served" basis would seem to create a situation where there will be a large number of applicants competing to submit their applications first in order to receive priority. For example, there could be a situation where an applicant who installed a system just last week would be given priority over an applicant who installed a system 11 months ago simply because their application arrived in the mail a day earlier. In order to be fairer to all applicants, I would request that the PUC review how it intends to disburse funds. I would suggest setting up a period during which applications will be accepted (for example 30 days), then disbursing funds for these applications based on their interconnection date.
6. Appendix A, Number 16 states "The PUC reserves the right to request system performance data for a period of five (5) years after receipt of the incentive". It is unclear

what system performance data the applicant would be required to provide to the PUC. While most grid-tied system do provide the user with some type of data display, many off grid systems do not. This requirement may be overly burdensome to applicants who do not have equipment to monitor their systems performance, depending on what performance data the PUC requests. I would ask the PUC review this requirement to determine if it should be included in the application process, and if so, to be specific of what the performance data is and how it should be tracked.

7. The previous Draft Incentive Application for Installed Residential small Renewable Electric systems included the opportunity to explain why the cost of the system listed in a contract varied from the actual cost (former Exhibit G). I believe there should continue to be a place to list such a discrepancy either on the application itself, or as an exhibit, in order to avoid delays in processing. In my case, the actual cost paid to the turnkey provider was less than the cost listed on the contract.

Respectfully Submitted,

Stephen J. Hagerman

-----Original Message-----

From: grice [mailto:garyrice@tds.net]

Sent: Tuesday, June 09, 2009 7:50 PM

To: Ruderman, Jack

Subject: Residential Small Renewable Energy Rebate Application

Jack,

We looked at the draft application, I realize that the time for comment has passed. Procrastination got in the way of responding on time. However, I wanted to let you know that we (my husband, Gary, and I) think that the application is very straightforward and fair. However, it would be helpful if we had more information on when a waiver would be granted relative to not having a solar installer. My husband is planning to put the system in himself. It would be very disappointing to find out after installing the system, that the waiver would not be granted.

Thanks for the opportunity to comment.

Bethann McCarthy

860 South Road

Hopkinton, NH 03229

-----Original Message-----

From: Mike Morton [mailto:mike@mikemorton.com]

Sent: Thursday, June 04, 2009 11:10 AM

To: Ruderman, Jack

Cc: Below, Clifton; Rep. David Pierce

Subject: (docket DE 09-054) comments on proposed Renewable Energy Rebates

Dear Jack --

Thank you for the opportunity to comment on the PUC's Draft application for Renewable Energy Rebates. I have several comments:

1) The Requirements section and other parts say that rebates are not available for systems of 5 kilowatts or more. This could create a situation where two neighbors install nearly identical systems, but the neighbor who pays just a little bit more toward New Hampshire's energy independence exceeds the 5Kw threshold and receives no rebate. I'm sure the intent is not to penalize homeowners who do more, but it may have that effect. A more equitable rebate might cap the capacity at 5Kw for purposes of the rebate calculation, but still include all residential systems. (For the record, our system is under 5Kw.)

2) The Requirements section and other parts say that the system must not begin operation before July 1, 2008, and Section C, line 1, suggests that the intent is to forbid rebates for an expansion of an existing system. There are several reasons why I believe the rebate should apply to expansions as well as completely new systems. (For the record, our system was begun in 2007 and expanded in September, 2008.)

2a) Expanding a system often provides more "bang for the (rebate) buck". Many expansions add only more panels -- the inverter and other "overhead" components are fully paid for in the first increment, not the expansion.

2b) Providing rebates on expansions encourages early adopters. The proposed policy discourages past early adopters from being pioneers with future renewable technologies. Early adopters take bigger risks (the technology is newer; the contractors are less experienced) and usually pay higher prices. State policy should reward them in some way.

2c) At least one utility (New Hampshire Electric Cooperative) does not give rebates for expansions. Applying the same rule to the state rebates is a double-whammy for early adopters.

2d) Regulations can distinguish between a true expansion (two consecutive projects) and a single ongoing project. They can do this with criteria such as whether the system is operational (if not, it's one project) and whether the contractor has received payment in full.

3) Section C, line 4 asks "Power Rating of each Panel". Some systems will have a mix of panel sizes, and owners would appreciate a clear statement that this is not an impediment to a rebate.

4) Appendix A, item 8 says: "Certain personal information including Social Security numbers will remain confidential." This sentence would be clearer with commas around "including Social Security numbers".

Respectfully submitted,

Mike Morton
40 Isaac Perkins Road
Lyme, NH 03768-3615

From: Mitch Sidd [mailto:mitch@clearmountainsolar.com]
Sent: Thursday, May 28, 2009 11:34 AM
To: Bateman, Diane
Subject: RE: DE 09-054 Small Residential Renewable Facilities Public Comment

Hi Diane,

I just have a few comments to reiterate from the meeting on the 26th. I voiced my concern about being pushed out of line by the "big fish". Large companies with large staff's are poised and ready to flood the incentive program with applications. This has happened in Vermont. They gobbled up the funds before any "small fish" got a chance. As I understand the process, the home owner is the one to fill out and file the application, so that should slow it down a bit. Can we please level the playing field?

How do I tell my customers that there is an incentive but we have to install it first and then you can hope and pray that there is money for the incentive. It seems to me that there should be a reservation process before the sale is consummated and before the install happens. Vermont does it that way. As I understand the process, all jobs completed before 8/31/09 would be in the retroactive category. Given that scenario, jobs that have not started yet but would be done by 8/31/09 qualify under the retro process.

Sorry for the ramble, I look forward to a response to these issues.

Mitch Sidd

Clear Mountain Solar

-----Original Message-----

From: Brian Pellerin [mailto:brian@freedomrenewable.com]

Sent: Friday, June 05, 2009 5:00 PM

To: Ruderman, Jack

Subject: DE 09-054 Small Residential Facilities Public Comment

Dear Jack,

Thank you for all of your hard work and time; this is an important part of the future for New Hampshire. During the hearing on May 15th there was an important discussion around ratings for wind turbines. As was discussed different manufacturers use different wind speeds to rate their turbine production. There is no uniform standard for rating. Typically manufacturers rate their turbines at speeds in excess of 20 mph. These high rating speeds are used to enhance energy output numbers for marketing but don't account for what is actually produced on average. In NH we have average wind speeds around 12 mph. This would seem to be a good place to set the rating to determine power output. This would allow wind turbine owners to participate on an equal basis with their solar neighbors.

Another important topic for us is related to Solar Thermal Energy. After attending the signing of house bill 1628 into law on August 6, 2008 we advised our solar thermal customers that they would be eligible for a rebate as part of the newly passed law. The law included solar thermal energy a class 1 renewable energy source provided that it displaced electricity. At the hearing on May 15th we were shocked to learn that this important renewable energy source had been removed from inclusion in the rebate process. At the end of the hearing in private conversations with the staff we confirmed that our solar thermal customers were expected to be excluded from the program. This is in direct conflict with the original text of the signed law.

During the hearing of May 15th it was reiterated that solar thermal will likely be part of additional rebates through a modification of the program created by RSA 362-F:10. It was also discussed that the possibility of having new rules be imposed once written only after a waiting period and allowing existing customers to take advantage of the rebate as it was clearly written for installations after July 1, 2008. Once the new rules are in place it will be clear to our future solar thermal customers that they may have to wait for the additional program. An application process should be established to include these residents that are the victims of the rule changes.

We also support the idea once the rules are in place of having a two stage application process that would allow residents to hold a place in line based on signed contracts or purchase of equipment or/and permit with an expiration date and a second stage when the system is commissioned.

Lastly as we discussed at the last hearing we think it would be wise to allow full transparency of the list by publishing it on a web site so that residents can clearly see when they might eligible for money. They move up the list as new funds are available and those above them are awarded rebates.

Thank you for your consideration of our ideas.

Sincerely,

Brian Pellerin

From: Marc Tessier [mailto:mtessier@goffstownnh.gov]

Sent: Friday, May 29, 2009 12:38 PM

To: Bateman, Diane; OCA Litigation; twlnh@aol.com; scondon@alterisinc.com; tvansant@alterisinc.com; info@begreensolar.com; mitch@clearmountainsolar.com; gilrichardson@wildblue.net; wbh@essexhydro.com; brian@freedomrenewable.com; mrrussell@freedomrenewable.com; matthews@gcglaw.com; joe.adams@grosolar.com; danielle@grosolar.com; tressy.manning@grosolar.com; mweissflog@kwmanagement.com; arthur.larson@us.ngrid.com; palmat@nhec.com; Amidon, Suzanne; Carmody, Jody; Ruderman, Jack; solarflare@pobox.com; Osgood, Jon; Reno, Maureen; Hatfield, Meredith; Traum, Ken; laura.richardson@nh.gov; eric.steltzer@nh.gov; hmoftett@orr-reno.com; frasemf@psnh.com; will@revisionenergy.com; jack@seasolarstore.com; info@shakerwoodsfarm.com; jkondos@home-efficiency.com; jgoodman@windguysusa.com

Subject: RE: DE 09-054 Small Residential Renewable Facilities Public Comment

Re: Docket No. DE 09-054

Incentive Payment for Small Residential Renewable Facilities
Public Comment

To whom it may concern,

I agree with Terence Donoghue's assessment of the useful application of solar thermal technology and it's relevant use as a viable alternative to fossil fuels. It is my feeling that this technology should receive equal consideration for any incentive programs.

Thank you,
Marc Tessier
11 Mount Dearborn Rd.
Weare, NH 03281