DE 10-212

STATE OF NEW HAMPSHIRE

Intra-Department Communication

DATE: February 18, 2016
AT (OFFICE): NHPUC

FROM: Elizabeth R. Nixon, Energy Analyst ERN

SUBJECT: DE 10-212 Commercial and Industrial Solar Rebate Program - Proposed Modifications and Redesign

TO: Martin P. Honigberg, Chairman
Robert R. Scott, Commissioner
Kathryn M. Bailey, Commissioner
Debra A. Howland, Executive Director and Secretary

CC: Karen P. Cramton, Director, Sustainable Energy Division
David K. Wiesner, Staff Attorney

The Public Utilities Commission (PUC) approved a Commercial and Industrial (C&I) solar rebate program (Program), pursuant to RSA 362-F:10, VIII, by Order No. 25,151 issued on October 1, 2010. The Program was expanded and modified pursuant to Order No. 25,764, issued on February 20, 2015. Staff now proposes to redesign and further modify the program to streamline its administration and reduce unnecessary delays in approving incentives, while continuing Category 1 smaller project review without interruption and reopening Category 2 for larger project applications. On October 7, 2015, PUC staff held a technical session and received comments related to proposed modifications to the program. After consideration of these comments and further analysis of relevant issues, Staff recommends a redesign of the program administrative process as well as changes to a number of specific program terms and conditions.

The primary purposes of the proposed modifications include the following:

- To simplify and streamline administration of the program;
- To reduce pre-installation administrative burdens on applicants, installers, and PUC staff;
- To eliminate unnecessary delays in installing systems resulting from extensive review of incentive applications prior to eligibility approval, by deferring submission of full supporting documentation until Step 2 of the application process;
- To add, drop, or modify certain program terms and conditions based on experience with application processing and program administration over the past year;
- To emphasize program compliance *certification* by the installer and applicant, rather than program compliance *documentation*, during Step 1 of the application process;
- To clearly describe the potential consequences of and recourse based on failure to meet required program terms and conditions, including the quality of installed equipment and project construction;

- To introduce interim milestone events that must be met in order to maintain incentive approval in the program; and
- To provide incentive payments for more projects by lowering the incentive levels and placing a dollar cap on each Category 2 project rebate.

Program Administrative Process Design

Step 1 would essentially be an incentive reservation process with general information and documentation regarding a few key terms only required to be submitted. This reservation approach should eliminate unnecessary delays in processing initial rebate applications. A few threshold conditions (e.g., meter and rate class, behind-the-meter load requirements, applicant/installer/developer caps for Category 2, etc.) would be reviewed to confirm program eligibility. In the Step 1 application, the applicant and installer would each be required to certify that the proposed system will meet all specific program terms and conditions. As a result of this streamlined initial step in the application process, approvals should be issued more quickly, while the burden and potential risk of meeting program terms and conditions would be placed squarely on the installer. Each installation contract would be required to provide either that the applicant is not required to pay the installer the approved rebate amount until after the applicant has received the payment, or that the installer will provide a refund or indemnity payment to the applicant if the rebate amount is paid by the applicant and the Step 2 application is then denied based on a finding of program ineligibility. In either case, if the rebate is not approved, the applicant ultimately would not be responsible for payment of an amount equal to the approved program incentive.

In Step 2, the applicant would be required to submit detailed documentation demonstrating that the project meets all of the program terms and conditions, together with a recertification of full compliance by the installer and applicant. To assist PUC staff with full verification of some number of applications and on-site inspection of some number of installed systems, Staff proposes that a qualified third party consultant be engaged. The PUC would issue a request for proposals for a consultant to perform such designated verification and inspection work, as well as potentially to conduct a certain number of post-payment project audits. Potential sanctions for installers and/or other development team members where projects are found to have material technical or administrative violations include full or partial suspension or debarment from the program for a specified period of months, depending on the severity of the violations found.

Program Terms and Conditions Modification

The detailed terms and conditions proposed by Staff are set forth in Tables 1 and 2 attached to this memorandum. Staff requests that stakeholders provide detailed comments on these proposed terms and conditions, with a particular focus on the following issues:

- Incentive levels and caps;
- Implementation and enforcement of an applicant/installer/development team cap;
- Milestones required to maintain rebate approval; and
- Treatment of systems that want to net meter, but are currently waitlisted due to utility net metering program limits.

A number of stakeholders have asked that an applicant/installer/development team cap on program applications be imposed that is similar to that proposed in recent net metering legislation (Senate Bill 378). Staff requests specific comment on how this cap would be implemented and enforced, what information should be submitted by the applicant and installer, and at what point in the process this documentation should be provided. In addition, stakeholders are asked to address who should be included under this cap. For example, should others be included (e.g., investors, etc.) or excluded (e.g., electrician, engineers, etc.) from the cap? In Staff's experience, the existing applicant cap has been difficult to administer and has often required submission of additional detailed information. Moreover, it appears that some developers and applicants have met the letter of the current program applicant cap while possibly not meeting its spirit.

Since the net metering limit has been met in two investor-owned distribution utility service territories and these utilities currently are not accepting new net metering interconnections, Staff requests specific comment on how program applicants on the utility net metering waitlist should be treated. Staff proposes that such applicants should be required to meet all relevant deadlines and milestones as would any other applicant, without extension or deferral based on their net metering waitlist status. These applications would not be permitted to hold a place in the program queue without meeting progress milestones while waiting for the net metering limit to be raised or for capacity to become available in the utility net metering program, under Staff's proposal.

Staff recommends that the program revisions become effective on a specified future date in order to allow enough time for the Step 1 and Step 2 application forms to be revised, as well as to ensure applicants will have sufficient time to gather and submit the required information. The current Category 1 program for projects 100 kW or less would continue in effect until the specified transition date. The Category 2 program for larger projects would not reopen until the specified transition date.

If no material changes in program design or administration from those outlined above are required based on stakeholder comments or Commission analysis, then Staff anticipates that the modified program could commence within 4-8 weeks following issuance of the order approving the program redesign.

Table 1 Category 1: Smaller Solar Systems		
Item No.	Terms and Conditions	Description
1.	Maximum system size	• 100 kilowatts AC or thermal equivalent. • For PV, system capacity is based on the total capacity of the project as evidenced by interconnection application(s) submitted to utility.
2.	Program Eligibility	Non-residential sites with a commercial meter and rate class, except for a multi-family residence of three or more units, if the system will serve the residential units in the building.
3.	Applicant Eligibility	Installation cannot be located on a residence, except a multi-family unit with three or more units. Home-based businesses are not eligible for a C&I rebate.
Incentive Levels		
4.	Incentive for new solar electric	• $0.55 per watt AC or 25% of total project cost, whichever is less. • Rebate is based on the lower of maximum rated output capacity (AC) of the inverter or the DC capacity of the PV panels.
5.	Incentive for solar thermal	$0.12/kBtu/yr for 15 or fewer collectors (0.07/kBtu/yr for greater than 15 collectors) or 25% of total project cost, whichever is less, based on optimal estimated generation.
6.	Incentive for expanded solar electric or thermal	None
7.	Maximum incentive in combination with other incentives received	• Rebate in combination with other rebates or grants received from the utility or other programs, including other local, state or federal programs, shall not exceed 25% of the total cost of the system. (Does not include federal Corporate depreciation (MACRS), tax credits (ITC, PTC), and tax exemptions). • Applicants receiving a REAP grant for all or any part of the system are not eligible for a rebate.
8.	Project $ cap	None
Terms and Conditions Requiring Documentation at Step 1		
9.	Electric Meter Type and Rate Class	PV system must be connected to a commercial meter with a commercial rate class at a non-residential site. Meter and rate class must have been in place for at least 12 months prior to the date of Step 1 application submittal. Commercial meter and rate class must be maintained for at least 12 months after system installation. For new structures and new meters, applicant must prove that the predominant use of the structure and property will be commercial. A residential meter and rate class is permitted only for a multi-family residence of three or more units, if the system will serve the units in the building. A copy of the most current electric bill and the electric bill from 12 months prior to the Step 1 application date must be submitted.

Table 1 Category 1: Smaller Solar Systems		
Item No.	Terms and Conditions	Description
10.	Interconnection Application for PV	A copy of the interconnection application(s) as submitted to the utility.
11.	Electric Load Requirements for PV	At least 50% of system's generation must serve the meter to which the PV system is connected or for a group net metering host, the group and host must be a single entity (e.g., a municipality, school, or incorporated neighborhood association and its members). The load requirement shall be shown by providing the 12 preceding months of electric usage for the meter as compared to the actual estimated generation of the system. New service will be evaluated on a case by case basis, where the applicant can demonstrate that 50% of the load will be used behind the meter at a new structure.
12.	Applicant/Installer/Development Team cap	None
13.	Certification of Compliance with all Terms and Conditions	Applicant and Installer shall certify full compliance with all program terms and conditions, including those which are demonstrated through Step 2 application.
Terms and Conditions Requiring Documentation at Step 2		
14.	Power Purchase Agreement for PV	PPA is required if the name on the electric bill and the applicant name are different. A copy of the PPA must be submitted.
15.	Shading Analysis	Determine the shading losses using one of the following: • Solar Pathfinder • Solmetric • Other models that are generally accepted by the industry and approved by NHPUC Sustainable Energy Division.

16.	Energy Modeling for PV	• Actual Estimated Generation vs Optimal Estimated Generation- must be greater than 80%
		  • Option 1 – PV Watts for both optimal and actual For Optimal, assume tilt of 35°; azimuth of 180°; AC to DC ratio = DC capacity/AC capacity; and system losses of 14%.
		  • For actual, use the same assumptions as optimal except use actual tilt and azimuth and system losses =100% - {1-[0.14 x (1-shading losses (%)/100]}
		• Option 2 – Solar Pathfinder for both optimal (ideal) and actual. Assume ideal (optimal) is tilt of 35°; azimuth of 180°.
		• Other options – Models and assumptions that are generally accepted by the industry and approved by NHPUC Sustainable Energy Division.

17.	Energy Estimation for Solar Thermal	• For optimal - use Collector SRCC/STC Rating for Medium Radiation Category C (kBtu/panel/day) x number of collectors x 365 days/year • For actual – optimal estimated generation x (1-losses

Table 1 Category 1: Smaller Solar Systems		
Item No.	Terms and Conditions	Description
		(%)/100)
18.	Registration with the Secretary of State	If the applicant, installer/development team members, electrical or plumbing company, or site owner is organized as a business or legal entity, then the entity must be registered and in good standing with the NH Secretary of State.
19.	Final Executed Interconnection Application for PV systems	A copy of the final executed interconnection application(s), including Exhibit B, must be submitted.
20.	PV panels certification	The solar PV panels must be certified by a nationally-recognized testing laboratory as meeting the requirements of UL 1703. Specification sheet for the panels must be submitted to show evidence of such certification.
21.	Inverter certification and specification sheet	Inverters must comply with IEEE 1547 and UL 1741. Specification sheet for the inverter must be submitted to show evidence of such certification.
22.	Solar thermal collectors/systems certification	The solar thermal collectors or systems must be SRCC/STC-certified. Specification sheet from SRCC must be submitted to show evidence of such certification.
23.	Lease agreement	If the owner of the site is not the applicant, then the site owner must demonstrate authorization through a lease agreement for the applicant to install the system on the site. A copy of the lease agreement must be submitted.
24.	Energy Audit/Energy Benchmarking	Not required.
25.	Labor Warranty	The installer's contract must include a five year labor warranty for the installation of the system. A copy of the contract between the installer and the applicant must be submitted.
26.	Google Earth image/aerial photo of site	Google Earth image or similar aerial photo of installation site.
27.	Panoramic photos of the horizon	Not required unless cannot provide an aerial image.
28.	System Schematic or Construction Drawings	A system schematic or construction drawings (e.g., electrical one-line diagram for PV) must be submitted.
29.	Permits and Approvals	Must certify that all required permits and approvals, including, if applicable, land use approvals, alteration of terrain, endangered species, wetlands, heritage, preservation, SWPPP, building, electrical, site plan, zoning, etc., have been obtained.
30.	Revenue Grade Production Meter for PV systems	A revenue grade production meter to meet REC eligibility must be installed for all PV systems.
31.	Btu Meter for Thermal systems	Meters to meet REC eligibility must be installed for all thermal systems.
32.	Renewable Energy Certificate (REC) Eligibility and REC applications	Must meet REC eligibility criteria, submit a complete REC application, and become REC certified by NHPUC. Must submit REC applications at the same time or prior to Step 2 application submittal.
33.	Photo of Entire PV System	Photo showing all solar panels (so that they can be counted)

Table 1 Category 1: Smaller Solar Systems		
Item No.	Terms and Conditions	Description
		Photo of all inverters Photo of utility meter Photo of REC meter
34.	Photo of Entire Solar Thermal System	Photo of collectors Photo of storage tank Photo of Btu meter (including production screen)
35.	Copy of Paid Invoices	Copies of invoices showing payment in full of all system costs, unless amount equal to approved rebate will not be paid until incentive has been paid to applicant.
36.	Copy of installation contract and any amendments and change orders	Contract must include: Applicant name and installer/development team names and contact information Total cost of system Payment terms and timing Address of facility installation Capacity of system (in AC and DC for PV) 5 year labor warranty Final Payment of amount equal to approved rebate deferred until after receipt of incentive payment, or installer binding obligation to refund to applicant amount equal to approved rebate if rebate not paid due to non-compliance with program terms and conditions.
37.	Recertification of Compliance with all Terms and Conditions	Applicant and Installer shall recertify full compliance with all program terms and conditions.
Other Terms and Conditions		
38.	Installation cannot be moved	Installation cannot be moved from site for at least 10 years.
39.	Rebate Payment	Payment will be made to applicant, after submittal of complete Step 2 application and review by NHPUC, subject to potential full verification and/or on-site system inspection by NHPUC or its authorized third party contractor.
40.	Inspection/Audit	NHPUC or NHPUC-authorized third party contractor may inspect and/or audit the project and request performance data for up to 10 years following approval of the Step 2 application and payment of the incentive. If NHPUC determines that the applicant or system has violated any program terms or conditions that cannot be corrected or reconciled, as applicable, then the applicant will be required to repay the rebate, and the project will not be eligible for a program incentive.
41.	Installer/Electrician/Development Team Suspension or Debarment	Installer/Electrician/Development Team may be suspended or debarred from submission of any or some number of rebate applications, if found to have violated material program terms, performed poor quality installation, installed substandard equipment, or made material misrepresentations in applications. Suspension or debarment to be in effect for a specified number of months or years, depending on

Table 1 Category 1: Smaller Solar Systems		
Item No.	Terms and Conditions	Description
		severity of violations found. •
42.	Step 2 application deadline	9 months after date of Step 1 approval
43.	Milestones to maintain approval	Project must meet all utility net metering queue milestones to remain approved for a rebate. If a milestone is missed, the applicant's approval will be surrendered, and the reserved rebate amount will be made available for use by other applicants. The applicant can reapply and reenter the queue for review and approval after achieving the missed net metering queue milestone(s). Net metering queue milestones must be met even if the system is not going to be net metered.
44.	Extensions of Step 1 approval period	• Must submit a written extension request 15 days prior to expiration of rebate approval. • Must explain reason for delay and show substantial progress throughout the entire approval period (e.g., evidence of active interconnection study, state and local permitting activities, equipment orders, etc.). Delays resulting from avoidable causes or intentional actions will not be considered grounds for extension.
45.	Transfer of funds between C&I program categories	Evaluate on a quarterly basis or as necessary.

Table 2 Category 2: Larger Solar Systems		
Item No.	Terms and Conditions	Description
1.	Maximum system size	• Maximum 500 kilowatts AC and greater than 100 kilowatts AC. • System capacity is based on the total capacity of the project as evidenced by interconnection application(s) submitted to the utility.
2.	Program Eligibility	Non-residential sites with a commercial meter and rate class, except for a multi-family residence of three or more units, if the system will serve the residential units in the building.
3.	Applicant Eligibility	Installation cannot be located on a residence, except a multi-family unit with three or more units. Home-based businesses are not eligible for a C&I rebate.
Incentive Levels		
4.	Incentive for new solar electric	• $0.40 per watt AC, or 25% of total project cost, or $150,000, whichever is less. • Rebate is based on the lower of maximum rated output capacity (AC) of the inverter or the DC capacity DC of the PV panels.
5.	Incentive for solar thermal	None
6.	Incentive for expanded solar systems of any type	None
7.	Maximum incentive in combination with other incentives received	• Rebate in combination with other rebates or grants received from the utility or other programs, including other local, state or federal programs, shall not exceed 25% of the total cost of the system. (Does not include federal Corporate depreciation (MACRS), tax credits (ITC, PTC), and tax exemptions). • Applicants receiving a REAP grant for all or any part of the system are not eligible for a rebate.
8.	Project $ cap	$150,000
Terms and Conditions Requiring Documentation at Step 1		
9.	Electric Meter Type and Rate Class	PV system must be connected to a commercial meter with a commercial rate class at a non-residential site. Meter and rate class must have been in place for at least 12 months prior to the date of Step 1 application submittal. Commercial meter and rate class must be maintained for at least 12 months after system installation. For new structures and new meters, applicant must prove that the predominant use of the structure and property will be commercial. A residential meter and rate class is permitted only for a multi-family residence of three or more units, if the system will serve the units in the building. A copy of the most current electric bill and the electric bill from 12 months prior to the

Table 2 Category 2: Larger Solar Systems		
Item No.	Terms and Conditions	Description
		Step 1 application date must be submitted.
10.	Interconnection Application for PV	A copy of the interconnection application(s) as submitted to the utility.
11.	Electric Load Requirements for PV	At least 50% of system's generation must serve the meter to which the PV system is connected or for a group net metering host, the group and host must be a single entity (e.g., a municipality, school, or incorporated neighborhood association and its members). The load requirement shall be shown by providing the 12 preceding months of electric usage for the meter as compared to the actual estimated output of the system. New service will be evaluated on a case by case basis, where the applicant can demonstrate that 50% of the load will be used behind the meter at a new structure.
12.	Applicant/Installer/Development Team cap	No applicant, developer, installer, or owner, nor any subsidiary or affiliated business organization or other entity, shall have more than 4 applications in the program queue at any one time, and the creation of multiple business organizations or entities by the same shall not defeat this term and condition.
13.	Certification of Compliance with all Terms and Conditions	Applicant and Installer shall certify as to full compliance with all program terms and conditions, including those which are demonstrated through Step 2 application.
Terms and Conditions Requiring Documentation at Step 2		
14.	Power Purchase Agreement for PV	PPA is required if the name on the electric bill and the applicant name are different. A copy of the PPA must be submitted.
15.	Shading Analysis	Determine the shading losses using one of the following: • Solar Pathfinder • Solmetric • Other models that are generally accepted by the industry and approved by NHPUC Sustainable Energy Division.

16.	Energy Modeling for PV	• Actual Estimated Generation vs Optimal Estimated Generation- must be greater than 80%
		• Option 1 – PV Watts for both optimal and actual
		  • For Optimal, assume tilt of 35°; azimuth of 180°; AC to DC ratio = DC capacity/AC capacity; and system losses of 14%.
		  • For actual, use the same assumptions as optimal except use actual tilt and azimuth and system losses =100% - {1-[0.14 x (1-shading losses (%)/100]}
		• Option 2 – Solar Pathfinder for both optimal (ideal) and actual. Assume ideal (optimal) is tilt of 35°; azimuth of 180°.
		• Other options – Models and assumptions that are generally accepted by the industry and approved by

Table 2 Category 2: Larger Solar Systems		
Item No.	Terms and Conditions	Description
		NHPUC Sustainable Energy Division.
17.	Registration with the Secretary of State	If the applicant, installer/development team members, electrical or plumbing company, or site owner is organized as a business or legal entity, then the entity must be registered and in good standing with the NH Secretary of State.
18.	Final Executed Interconnection Application for PV systems	A copy of the final executed interconnection application(s), including Exhibit B, must be submitted.
19.	PV panels certification	The solar PV panels must be certified by a nationally-recognized testing laboratory as meeting the requirements of UL 1703. Specification sheet for the panels must be submitted to show evidence of such certification.
20.	Inverter certification and specification sheet	Inverters must comply with IEEE 1547 and UL 1741. Specification sheet for the inverter must be submitted to show evidence of such certification.
21.	Lease agreement	If the owner of the site is not the applicant, then the site owner must demonstrate authorization through a lease agreement for the applicant to install the system on the site. A copy of the lease agreement must be submitted.
22.	Energy Audit/Energy Benchmarking	Not required.
23.	Labor Warranty	The installer's contract must include a five year labor warranty for the installation of the system. A copy of the contract between the installer and the applicant must be submitted.
24.	Google Earth image/aerial photo of site	Google Earth image or similar aerial photo of installation site.
25.	Panoramic photos of the horizon	Not required unless cannot provide an aerial image.
26.	System Schematic or Construction Drawings	A system schematic or construction drawings (e.g., electrical one-line diagram for PV) must be submitted.
27.	Permits and Approvals	Must certify that all required permits and approvals, including, if applicable, land use approvals, alteration of terrain, endangered species, wetlands, heritage, preservation, SWPPP, building, electrical, site plan, zoning, etc., have been obtained.
28.	Revenue Grade Production Meter for PV systems	A revenue grade production meter to meet REC eligibility must be installed for all systems.
29.	Renewable Energy Certificate (REC) Eligibility and REC applications	Must meet REC eligibility criteria, submit a complete REC application, and become REC certified by NHPUC. Must submit REC application at the same time or prior to Step 2 application submittal.
30.	Photo of Entire PV System	Photo showing all solar panels (so that they can be counted) Photo of all inverters Photo of utility meter Photo of REC meter
31.	Copy of Paid Invoices	Copies of invoices showing payment in full of all system costs, unless amount equal to the approved rebate will not be

Table 2 Category 2: Larger Solar Systems		
Item No.	Terms and Conditions	Description
		paid until incentive has been paid to applicant.
32.	Copy of installation contract and any amendments and change orders	Contract must include: Applicant name and installer/development team names and contact information Total cost of system Payment terms and timing Address of facility installation Capacity of system (in AC and DC for PV) 5 year labor warranty Final Payment of amount equal to approved rebate deferred until after receipt of incentive payment, or installer binding obligation to refund to applicant amount equal to approved rebate if rebate not paid due to non-compliance with program terms and conditions.
33.	Recertification of Compliance with all Terms and Conditions	Applicant and Installer shall recertify full compliance with all program terms and conditions.
Other Terms and Conditions		
34.	Installation cannot be moved	Installation cannot be moved from site for at least 10 years.
35.	Rebate Payment	Payment will be made to applicant, after submittal of complete Step 2 application and review by NHPUC, subject to potential full verification and/or onsite system inspection by NHPUC or its authorized third party contractor.
36.	Inspection/Audit	NHPUC or NHPUC-authorized third party contractor may inspect and/or audit the project and request performance data for up to 10 years following approval of the Step 2 application and payment of the incentive. If NHPUC determines that the applicant or system has violated any program terms or conditions that cannot be corrected or reconciled, as applicable, then the applicant will be required to repay the rebate, and the project will not be eligible for a program incentive.
37.	Installer/Electrician/Development Team Suspension or Debarment	Installer/Electrician/Development Team may be suspended or debarred from submission of any or some number of rebate applications, if found to have violated material program terms, performed poor quality installation, installed substandard equipment, or made material misrepresentations in applications. Suspension or debarment to be in effect for a specified number of months or years, depending on severity of violations found. •
38.	Step 2 application deadline	12 months after date of Step 1 approval
39.	Milestones to maintain approval	Project must meet all utility net metering queue milestones to remain approved for a rebate. If a milestone is missed, the applicant's approval will be surrendered, and the reserved rebate amount will be made available for use by other applicants. The applicant can reapply and reenter the

Table 2 Category 2: Larger Solar Systems		
Item No.	Terms and Conditions	Description
		queue for review and approval after achieving the missed net metering queue milestone(s). Net metering queue milestones must be met, even if the system is not going to be net metered.
40.	Extensions of Step 1 approval period	• Must submit a written extension request 15 days prior to expiration of rebate approval. • Must explain reason for delay and show substantial progress throughout the entire approval period (e.g., evidence of active interconnection study, state and local permitting activities, equipment orders, etc.). Delays resulting from avoidable causes or intentional actions will not be considered grounds for extension.
41.	Transfer of funds between C&I program categories	Evaluate on a quarterly basis or as necessary.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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Docket #: 10-212-1 Printed: February 18, 2016

FILING INSTRUCTIONS:

a) **Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

DEBRA A HOWLAND
EXECUTIVE DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429

b) **Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**

c) **Serve a written copy on each person on the service list not able to receive electronic mail.**

DE 10-212 Commercial and Industrial Solar Rebate Program'

Email List

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