

Debra Howland
Executive Director
New Hampshire Public Utilities Commission
21 S. Fruit St, Concord, NH 03301-2429

RE; Docket DE 14-104

Dear Ms. Howland,

I ask that the legislature and the PUC reject the energy providers' claims that the lack of supply of RECs, regardless Class, justifies an adjustment to their RPS requirements.

I am commenting both as a citizen and a small business owner in New Hampshire. I am an Independent Monitor in service to the New Hampshire Public Utilities Commission. This is a service that I both honor and for which I am grateful. I see the comments from the various participants stating business-related concerns, environmental concerns, and general concerns.

As a citizen, I need to say Renewable Energy is here to stay. The future is here now and there is no way to turn back the tide. The fellow citizens I talk to share my views and it the reason they have made a decision to proceed with installing alternative energy systems on their properties, be they residential, commercial, or industrial.

What is the most-often heard comment I hear is that we, as citizens, have had enough. Enough coal, enough business-as-usual, and enough lies. Yes, it sounds damning, but we have been being lied to.

The energy providers were able to convince certain willing listeners that alternative energy doesn't work in New Hampshire. And there are not enough RECs to buy to avoid the ACP. They labeled the ACP as a "stealth tax". The word "tax" does not float very well in NH, per se, but when the providers had a willing audience in the legislature, they succeeded in weakening our State's participation in RGGI to the point where we are currently able to exit RGGI if only two other states in the coalition drop out.

The result of lobbying efforts is that the value of RECs in NH is pitiful, and the ACP is a joke. But the truly nastiest result of the lobbying effort is that legal larceny has been created. Utilities are now able to take a percentage of unclaimed, or unprotected, RECs and add them to their RPS requirements.

FOR FREE.

Does this make sense? I think not.

So, they get to buy RECs at a reduced value. If they can't buy enough to meet the RPS, they pay an ACP that is fairly painless. And if that is not enough, they can steal RECs to meet their needs. What a deal.

As a small business owner in our State, I have been striving to create aggregate pools of small, residential, and larger commercial, Photovoltaic arrays. I have been developing this for three years and was able to provide a Jan 2014 report to the NHPUC that 485 Class II RECs were created from the sun, in New Hampshire.

Did anyone notice that Class II RECs are not an issue here? Only Class I and III? Why? Never doubt that a small group of like-minded individuals can make a difference.

I ask that the legislature and the PUC reject the energy providers' claims that the lack of supply of RECs, regardless Class, justifies an adjustment to their RPS requirements.

A handwritten signature in black ink, appearing to read "Paul L. Button". The signature is written in a cursive style with a large initial "P" and "B".

Paul L. Button
Owner: Energy Audits Unlimited
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603-836-4402