

NEW HAMPSHIRE  
SUSTAINABLE ENERGY  
ASSOCIATION

Debra Howland, Executive Director  
NH Public Utilities Commission  
21 South Fruit Street  
Concord, NH 03301

October 20, 2017

Re: DE 15-302 Residential Renewable Electric Rebate Program Recommendations for Program Modifications

Dear Executive Director Howland,

Thank you for this opportunity to comment on the proposed changes to the Residential Renewable Electric Rebate Program. NHSEA is a statewide nonprofit organization, which educates and advocates for sustainable energy in New Hampshire. We have hundreds of residential and business members across the state of NH, all of whom have a great interest in renewable energy, including solar and biomass energy.

NHSEA appreciates the Staff recommendation and Commission action to lower the incentive levels for the aforementioned rebate program. The relatively small program budget will not meet current demand, and the closure of the rebate program is problematic for consumers and businesses alike. Lowering the incentive levels in order to maintain an open and operational program from one fiscal year to the next is an important measure to take in order to maintain market stability.

Given how limited the program budget is, we recommend a rebate level that is lower than \$1,500. We recommend the rebate level be capped at a maximum of \$1,250. However, for applicants that are from the low-to-moderate income bracket, which could be defined at up to 200-300% of the federal poverty guidelines, we recommend that the incentive level be set at a higher level.<sup>1</sup> We recommend the maximum rebate for this customer segment be set at \$4,000 (or up to 50% of project costs, whichever is the lower amount). This level also takes into account the fact that many LMI ratepayers are not able to use the 30% federal income tax credit.

In order to better share the benefits of the REF and solar energy with all customer classes, as well as comply with SB 129, we recommend using a part of the REF budget (specifically, a portion of the 15% SB 129 allocation) to supplement the base rebate with this recommended LMI "adder" rebate in order to

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<sup>1</sup> For example 300% of the 2017 federal poverty level for a family of four would be a total annual income of \$73,800. <https://aspe.hhs.gov/poverty-guidelines>

fund the difference between \$1,250 and \$4,000. Eligibility for this adder can be proven by requiring applicants to submit the previous year's tax return.

At \$3.50/Watt, a three kilowatt system would cost \$10,500: a \$4,000 rebate would bring that cost down to \$6,500. While \$6,500 is still a significant investment, it puts solar energy in the realm of possibility for some LMI households, especially when the balance can be privately financed and the customer realizes savings on their electric bill immediately upon system operation.

Thank you for addressing this situation: we urge the Commission to determine and finalize the new incentive levels in order to re-open the rebate program as quickly and efficiently as possible.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Kate Epsen', with a long horizontal flourish extending to the right.

Kate Epsen  
Executive Director  
NHSEA