



CLEAN ENERGY NH

Your Voice in All Energy Matters

14 Dixon Ave, Suite 202 | Concord, NH 03301 | 603.226.4732

March 31, 2021

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

Re: Renewable Energy Fund Residential and Commercial and Industrial Solar Rebate Comments

Dear Director Howland,

Clean Energy NH (CENH) appreciates the opportunity to submit comments regarding the Renewable Energy Fund (REF) solar rebate programs for both the residential and C&I sectors. Subsequent to the technical session held by PUC Staff on March 10, 2021, CENH submits the following initial feedback for consideration by the Commission.

Residential Rebate Amount

- CENH does not support consideration of lowering the current rebate amount. We think that a residential PV solar rebate amount less than \$1,000 would be too small to be effective.

C&I Rebate Amount

- CENH does support considering additional C&I rebate supplement depending on total funding availability. We would support rebate supplements allocated to PV systems owned by not for profit entities, especially for small systems up to 250kW.
- CENH does not support a tier based approach relative to kW size (it is our belief that the \$/W rate and cap already account for economies of scale).
- **CENH supports maintaining the current formula for turnkey/investor owned power purchase agreement (PPA) projects unless the C&I solar rebate budget for that year is \geq \$2.5 million, then CENH supports doubling the formula.**
- CENH supports doubling the formula to \$0.40/W with a \$20k cap for tax-exempt owned projects, regardless of funding availability.

Application Procedures

- CENH supports continuing with the online only application and eliminating any application requirements that are not absolutely necessary, including the notarization requirement. It is important to reduce any “soft costs” to improve the economics of the projects and ease of application.



CLEAN ENERGY NH

Your Voice in All Energy Matters

14 Dixon Ave, Suite 202 | Concord, NH 03301 | 603.226.4732

Lastly, CENH strongly encourages the PUC, or the new Department of Energy (when/if it takes over the administration of the REF), to minimize program disruptions, eliminate interruptions in funding programs, avoid delays in setting budgets, avoid waitlists, reduce disruptions or delays during fiscal year transitions, and eliminate stops-start. In order to effectively administer the REF and associated programs, the PUC should advocate for the passage of SB78 (or similar language now in HB2) to change the REF back to being continually appropriated to the Commission.

CENH appreciates the opportunity to provide comments regarding the REF solar rebate programs and looks forward to continuing to work with Staff and the other stakeholders to reach an acceptable consensus on this matter. Please feel free to reach out if any questions arise.

Sincerely,

Madeleine Mineau
Executive Director