

**From:** greg southpacksolar.com

**Sent:** Thursday, August 15, 2024 6:32 PM

**To:** PUC: Clerks Office <ClerksOffice@puc.nh.gov>

**Subject:** Docket 22-060 (NEM 3.0) Comments by Gregory Blake - South Pack Solar

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To Whom It May Concern.

I'm a 52-year resident of NH and have been designing and installing PV and storage systems in the state since 2010 which includes over 300 customers mostly in the Monadnock region. We earned Solar Energy International's Solar Professional Certification – the industry's Gold Standard credential in 2012.

I have observed and been affected by the gyrations in solar regulation here in NH over the 14 years that South Pack Solar has been in business and would like to say unequivocally that the move from NEM 1.0 to NEM 2.0 was a major blunder on your part and should be reversed and slightly modified. This policy change made it impossible for reputable installers to give an accurate payback estimate to consumers contemplating going solar as both electrical generation and consumption patterns of every residence (and business) in the state differ. Having a different (substantially lower) value for solar generated and exported energy makes the financial math impossible. This issue is compounded by the fact that PV systems in NH can generate 3X the amount of electricity on a typical summer day (compared to a winter day) creating a dynamic that unfairly favors the utilities as they get a huge amount of electricity (at a very low price) injected into the grid during the summer that consumers have paid (by investing in solar) to have made and then get to sell more electricity to solar generators in the winter (at full retail pricing) when PV systems are less productive. This unfairly favors the utilities at the expense of consumers. Additionally, it is my sincere opinion that the move from NEM 1.0 to NEM 2.0 is the major reason why we trail our neighboring states in the level of solar penetration. My opinion has been informed by the fact that 98% of our customer base pay for their systems out of pocket with no financing. I can only conclude that your policy decision in 2017 effectively has taken the choice to go solar off the table for people of average means or has forced them to go into

one of those crazy Power Purchase Agreements offered by unscrupulous national solar installers – which are effectively negatively amortizing loans. Folks with means will continue to do solar regardless of what you folks decide but it's the average people you ought to be looking out for – they desperately want to do their part in saving the planet by reducing greenhouse emissions but NEM 2.0 often prevents them from acting.

To soften the return to NEM 1.0 (for the utilities) a monthly fixed surcharge of \$5 for small solar installations should be added to the account holder's bill. This policy modification makes the math easily understandable for everyone so that consumers can make good decisions!

I encourage you to fix this problem by making the change to NEM 3.0 a return to NEM 1.0 with a small monthly surcharge. Please let me know if you have any questions or if I can be of further assistance.

Regards,

Greg