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THE STATE OF NEW HAMPSHIRE



PUBLIC UTILITIES COMMISSION 21 S. Fruit Street, Suite 10 Concord, N.H. 03301-2429

May 28, 2009

Debra A. Howland Executive Director New Hampshire Public Utilities Commission 21 South Fruit Street Suite 10 Concord, New Hampshire 03301

> Re: Docket No. DE 09-054 Incentive Payment for Small Residential Renewable Facilities Public Comment

Dear Ms. Howland:

On May 23, 2009, Mr. Terence Donoghue submitted electronic comments to Jack Ruderman regarding the revised draft application form for the Residential Renewable Energy Generation Incentive Program

It was his intent that these comments would be shared with the Commission and formally filed in the above-captioned docket to be included as part of the record. Please let me know if you have any questions.

Sincerely,

Suzanne amidon (db)

Suzanne Amidon Staff Attorney

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-----Original Message----- **To:** Ruderman, Jack **Subject:** Comment on Residential Renewable Incentive Program-Docket No. DE 09-054

Dear Jack,

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Thank you for taking time to speak with me yesterday on the phone about the Residential Renewable Incentive Program. I would like to reiterate my disappointment, let me add dismay, about the recent turn of focus for the program away from solar thermal eligibility in the draft application. I say "recent" having followed developments for HB1628, RSA 362-F, and PUC 2500 for a year or so and seeing no public indication of the turn away from solar thermal until I read the draft application resulting from the technical session of May 15 that I was unfortunately unable to attend. It has been abundantly clear from all communications regarding HB1628 up to that point in public communiques, PUC 2500, and RSA 362-F that the definition of a class 1 source would include and was intended to include solar thermal technologies.

My disappointment, as a homeowner, comes from recently having invested in solar thermal to both heat my water and my home and feeling like I've been duped about the incentive that was clearly and publicly stated as warranted under the program. Secondly, as an engineer, let me express dismay at the twice folly of focus on solar photovoltaic and turn away from solar thermal. Without going into a lengthy diatribe about the history and current merits of the two technology areas, let 's do a simple test, answerable by anyone backing the current proposal while I reserve right of comment on their assumptions and calculations. Show me a quote and economic analysis (with and without current transient local, state and federal incentives) for any New Hampshire installed, residential-scale photovoltaic system presently available (or even conceived with currently developing technology) that will pay itself back within the useful lifetime of the equipment. Then let us do the same analysis for solar thermal. Undoubtedly, there are other serious issues than money involved but, let's face it, economics will be a significant factor in the ultimate widespread acceptance of any new technology.

It is clear, as was shown in the late 70s and 80s in this country, and is being demonstrated again now both here and in other countries, that photovoltaic is a poor investment for the homeowner, New Hampshire and the Nation. In direct opposition, as can been seen in my backyard, solar thermal makes sense today and will more so in the future. Solar thermal is where New Hampshire should invest.

I would be glad to comment further or answer questions if that would be helpful to the Commission. Unfortunately, due to work commitments, I am unable to attend the May 26 public hearing.

I look forward to you and the Commission's response to these important issues.

Best Regards, Terence Donoghue 170 Underhill Rd Meriden, NH