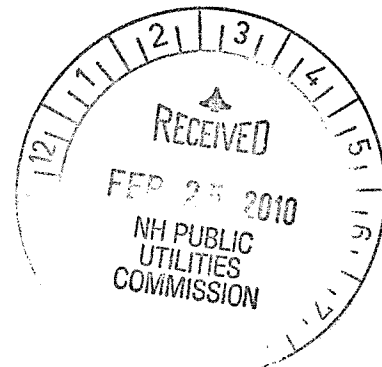




NORTHERN NEW ENGLAND  
HOUSING INVESTMENT FUND

Debra Howland  
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New Hampshire Public Utilities Commission  
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Via Email: executive.director@puc.nh.gov



RE: DE-10-024 Renewable Energy Fund Notice of Opportunity to Comment, Technical Session on residential solar hot water.

Dear Ms. Howland,

Thank you for this opportunity to send comments to the technical session on solar hot water. Solar thermal technology offers a true renewable energy source for a significant portion of the residential energy load (water heating is estimated to account for 12% of residential energy use in New Hampshire). Northern New England Housing Investment Fund has been actively exploring assisting affordable housing owners in shifting to this sustainable energy technology. The lack of sufficient incentives for solar hot water is a key barrier. The capital costs of solar thermal are significant and do therefore require subsidy to assist in the conversion to this sustainable technology.

Multi-family properties represent a strong application for solar thermal. The affordable housing section represents a unique opportunity to allow low-income consumers to benefit from renewable technology.

In designing a program it is critical to address the differences between single family applications and multifamily. The SRCC OG-300 certification, which certifies all parts of a solar system (the collectors, controllers, and tank) in one configuration, is appropriate to the single family market where the system is analogous to an appliance purchase. To maximize the benefit in multifamily or commercial applications the OG-100 certification (certifies the solar collector and allows flexible design for size of installation, tank and controllers) is the appropriate level of certification. California which recently examined this issue and designed a solar thermal incentive program determined that the SRC 100 was the appropriate multi-family certification.

To ensure installer quality the Commission should require North American Board of Certified Energy Practitioners (NABCEP) certified installers (<http://www.nabcep.org>) and/or a minimum number of prior system designs and installations and proof of design capability. This would allow the Commission to minimize the amount of solar design and site specific information required on the application while maintaining control over the quality of design and installation.

In the multi family application it is important that the incentive be set to reflect the number of units or energy production. Incentives set to a fixed dollar figure based on the single family market will handicap the technology in the multi-family application.

The Commission is considering developing a program in order to accept and utilize the ARRA funding for residential solar thermal hot water. Due to the need to expend ARRA monies quickly, including multifamily as a target in this effort will help assure that sufficient units are available and able to be enrolled quickly.

Please let us know if we can provide further information.

John Anton  
President