



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

17 March 2010

Re: Docket No. DE 10-024
Staff's Recommendation letter dated March, 15 2010

Dear Ms. Howland,

First I would like to complement the staffs' recommendations as they encompass many of the discussion which took place at the February 28th technical session, job well done.

I am in agreement with most of the two part Solar Thermal application and my only comment would be to adopt the tiered monetary incentive option of \$500.00, \$250.00 and \$125.00 based on the staffs recommendation rather than incentives based on the annual system BTU output method as indicated on both the pre-application and incentive request, while I initially supported the BTU method it does complicate the application and become more subjective.

I am also in favor of adding one question to the incentive request form – Does the solar thermal system include a thermal energy production monitoring system, this does not mandate production tracking but in future years it will be a valuable data point for system production verifications - and at no cost to rate payers.

I am in agreement with the proposed staffs REF budget recommendations and believe that the budget addresses the concerns of commercial and industrial rate payers while maintains funds for current and proposed programs. As the commission will hear from many renewable energy businesses, continuity in the incentive program is imperative in the quest to promote continued stable employment and job growth.

A few recommendations for the C&I program,

While the long term continuity of the NH RE incentive program is very important for sustainable business growth, an appropriate incentive level for C&I RE system sizes up to 100kW need to be implemented immediately - this would correspond with the size limitations of PUC 900 ruling and current net metering laws. While smaller RE system are currently more prevalent in NH - systems in the 50 - 100kW are currently installed and proposed at a lower cost per installed watt resulting in a more cost effective use of rate payer monies.

A tiered incentive program of 1-25kw at \$1.25, 26 -75 kW at 1.00, and 76-100 kW at .50 per respective watt should be implemented to allow for more cost effective renewable energy installations.

No cap on incentives for system size should be promoted for systems that comply with the current 100kW Net metering standards, this may affect the total number of commercial customers served, but it allows access to funding for all and promotes more cost effective installations.

How does NH maintain the Renewable Energy Fund for current programs?

The program funding is limited in part due to the reduction in current energy sales and the least cost to consumer requirement by utilities being met by out of state REC purchases, this needs to change. We are spending NH rate payer monies to purchase REC's from states that have had mature residential and commercial renewable programs in existence for over a decade at the cost of NH incentive programs and jobs.

In addition other New England states have offered additional incentives for products made in there state, currently NH business offer very few end user RE products that are made in NH, and by specifying a minimum amount of REC's that must be purchased for NH sources you are accomplishing similar outcomes through promoting NH RE systems and local job growth.

Please feel free to call me should you have any further questions.

Sincerely,

Mark P. Weissflog

Mark P. Weissflog, President
KW Management, Inc.

**55 Lake Street Box # 4
NASHUA, NH 03060
(603) 598 – 0181 Office
(603) 598 – 5188 Fax**