



Professional design, installation and service of solar energy systems

March 7, 2016

Elizabeth Nixon  
Energy Analyst, Sustainable Energy Division  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301

**Re: DE 10–212, Comments of Revision Energy regarding Proposed Modification and Redesign of C & I Solar Rebate Program**

Dear Ms. Nixon:

Thank you for the opportunity to comment on the proposed changes to the Commercial and Industrial Solar Rebate Program.

As I stated in my comments during the public comment hearing on Thursday, March 3, 2016 ReVision recommends that if rebate levels must be reduced, that the Category I rebate be reduced from \$.75 per watt to \$.65 per watt, and that the Category 2 rebate be reduced from \$.65 per watt to \$.55 per watt.

On the whole ReVision Energy strongly supports staff's effort to streamline the Step 1 application form and process.

We oppose Item #11, Table 1 and Table 2 – Electric Load Requirements for PV, however, on the grounds that this proposed item would add a new requirement to the Step 1 process, would be burdensome for solar installers, would hamper development of new group net metered solar projects, and would create extra work for staff that would undoubtedly cause delays in the processing of Step 1 applications.

In the event that the Commission is inclined to approve this proposed requirement, we would request that the language be clarified to make clear that third party power purchase agreement (PPA) projects that are group net metered, where the group and host are a single entity, are exempted from the 50% generation behind the meter requirement. In other words, if the solar array is owned by a third party but the host organization and the group members are part of the same organization, then the proposed load requirement would not apply.

ReVision supports the proposal to eliminate the existing Step 2 energy audit requirement for both Category 1 and Category 2 solar systems. This would help streamline the rebate review process and reduce the administrative burden on both applicants and staff.

With regard to the Item 12, Table 2, Applicant/Installer/Development Team cap, ReVision urges the Commission to support this proposed condition in order to ensure that limited rebate



funds for Category 2 are not monopolized by a single developer. ReVision believes that the language staff provided in its memo under the “Description” column for Item 12, Table 2, should be adopted, verbatim<sup>1</sup>, by the Commission, notwithstanding staff’s concerns that the language needs further development.

ReVision reiterates that there are examples of similar program limitations that have been successfully implemented in other states such as the Commonwealth Solar I in Massachusetts. Staff may wish to review the Commonwealth Solar I program manual which sets limits on rebates per developer and provides straightforward definitions of terms such as “installer and “installer entity.” Please see, [http://www.concordma.gov/Pages/Concordma\\_Schools/CommSolarProgramManual.pdf](http://www.concordma.gov/Pages/Concordma_Schools/CommSolarProgramManual.pdf)

Here is the language limiting the amount of rebate funds that can be allocated to any single “Installer Entity:”

<b>Cap on Outstanding Awards For Each Installer Entity</b>	<p>MTC will not process new applications involving an Installer Entity that will result in that Installer Entity’s involvement in:</p> <ul style="list-style-type: none"><li>• more than \$1,200,000 in Commonwealth Solar Rebate Awards for PV projects that have not reached Project Completion, <b>or</b></li><li>• more than \$400,000 in Commonwealth Solar Rebate Awards for residential PV projects that have not reached project completion.</li></ul> <p>Accordingly, these related applications will not be placed into the Process Queue.</p> <p>Work that the Installer Entity is doing as the primary Installer or subcontractor is considered “involvement” and applies toward calculation of this cap. MTC, at its sole discretion, will determine the applicability of the cap to an Installer in the event of a dispute.</p>
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Here is the language defining the terms “installer” and “installer entity”:

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<sup>1</sup> The language reads: “No applicant, developer, installer, or owner, nor any subsidiary or affiliated business organization or other entity, shall have more than 4 applications in the program queue at any one time, and the creation of multiple business organizations or entities by the same shall not defeat this term and condition.”



## 2.2. Installer Related Terms

<b>Installer</b>	The PV project Installer is defined as the primary entity responsible for the PV project installation for the Applicant. The Installer is typically directly responsible for turnkey project management and installation work. However, the entity responsible for overall project management and installation is not required to actually (or physically) install the project and, for example, could be responsible for turnkey project management and sub-contracting the installation work to another entity or entities. The Installer also could be a third-party owner that has a Turnkey Contract involving a power purchase agreement and other arrangements with the Applicant or project host and a separate contract with another Installer for installation work.
<b>Installer Entity</b>	A parent company or parent organization and all of its subsidiaries are considered a single Installer Entity.

Thank you for your time and consideration.

Sincerely,

/s/

Jack Ruderman  
Director, Community Solar Initiatives

Cc: Karen Cramton  
David Wiesner