
From: Paul Schlie <paul.schlie@harmonyenergyworks.com>
Sent: Tuesday, March 08, 2016 7:57 AM
To: PUC - Executive.Director; Cramton, Karen; Nixon, Elizabeth
Cc: George Horrocks
Subject: Re: Proposed DE 10-212 C&I Program Revision

In hopes providing a bit more detailed feedback on at least a few of the proposed revisions will be helpful, please consider:

- To begin with, it makes no sense to reserve funding for projects which haven't been sufficiently vetted and engineered to enable determination of their compliance with the programs technical and administrative requirements, as not requiring such documentation until after potentially 10's if not 100's of thousands of dollars have been expended will only likely enable poorly vetted programs to receive reserved funding, being antithetical to what should be the PUC's goals; and thereby an application's essential requirements should be documented before-hand in Step-1, as is presently the case for good reason.

The PUC should be able to efficiently administer an applications review in substantially less time than it takes to generate them, as all that should be required, is to verify the requested documentation in fact accompanies the application, and that's been attested to be complete and correct to the best of the author's and applicant's knowledge, no more than an hour should be required for it's review; and thereby a single person could review enough detailed Step-1 applications in less than a month to preliminarily reserve the entire year's budget assuming an average project size of 50KW, so Step-1 application simplification should not be considered necessary to satisfy an expectation of reasonably responsive acceptance or denial of such applications upon submission.

- Secondly, it makes no sense to specifically and exclusively penalize applicants of USDA REAP grants (meant to assist small rural businesses seeking further funding assistance of renewable energy projects in whole or in part), as doing so would be antithetical to the stated goals of the PUC and will only be detrimental to all parties; as by disincentivizing NH business from seeking complementary funding from sources at no expense to the state, the PUC will only help assure no further money flows into the state in support of the projects and business it should be striving to assist.

- Thirdly, although there is likely good reason to reduce rebate incentive rates, the most likely effective means of enabling less to go around, is to bring back a maximum rebate caps, possibly such that rebates are only received for the first 100KW of capacity for example, and thereby larger projects inherently receive proportionately less incentive, thereby allowing more to remain available for smaller projects, who whom such rebates are also more vital.

- Finally, although not necessarily least significant, the PUC neither has, nor should have, any authority to "authorize", "suspend" or "debar" any Installer/Electrician/Development team from being contracted by the applicant to perform any services for which they are lawfully able to perform. The PUC is neither a licensing nor policing agency granted such authority by the state legislature. The PUC's authority in the matter is limited to defining rebate program requirements an equitable and unbiased manner to hopefully encourage the broader adoption of renewable energy generation systems, nothing more, nothing less.

Thank you, and best regards,

-paul-

On Mar 7, 2016, at 4:35 PM, Paul Schlie <paul.schlie@harmonyenergyworks.com> wrote:

Upon much consideration, and after careful review of the many proposed changes, please consider delaying their adoption until after the PUC publishes corresponding rationale associated with each change, and provide a final period for response and its review.

As absent such detailed explanation, it's hard to ascertain how modifying the requirements as proposed, and delaying their review to verify compliance, will result in anything but confusion and worst case needless hardship; either resulting from detecting too late what could/should have easily been corrected earlier in the process, or indirectly penalizing well analyzed applications which take a bit more time to design and quote, by enabling the allocation of limited rebate funds to poorly vetted ones presented to the PUC prematurely.

Best regards,

-paul-

Paul Schlie