

**CLEAN ENERGY NH**

Your Voice in All Energy Matters

54 Portsmouth Street | Concord, NH 03301 | 603.226.4732

September 26<sup>th</sup>, 2019

Ms. Debra A. Howland  
Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 18  
Concord, New Hampshire 03301

Re: DE 10-024, DE 10-212, DE 13-298, DE 15-302 and DE 17-172: Proposed Fiscal Year 2019 Renewable Energy Fund Program Budgets

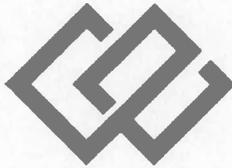
Dear Ms. Howland,

As follow up to our comments made during the public comment hearing on the Staff's proposed FY19 Renewable Energy Fund budgets, Clean Energy NH along with Revision Energy submit the following joint written comments.

The Alternative Compliance Payments (ACP) received for 2018 were significantly lower than previous years and the lowest revenue since a low of \$1.34million in 2009. This reduction in revenue into the Renewable Energy Fund (REF) which supplies renewable energy grants and rebates is cause for concern. The REF has been plagued with sudden starts and stops, program closures, waitlists, and lotteries which create significant uncertainty and instability which is harmful to the renewable energy business sector in NH and those looking to invest in renewable energy in our state.

We understand that limited funding caused Staff to make difficult decisions in the proposed FY19 REF budget. Most notably Staff proposed funding the existing waitlist of application for the Commercial and Industrial (C&I) Solar rebate program and then closing the program entirely to new applications for FY19. We are opposed to closing the C&I Solar rebate program which is very important to encouraging municipalities, small businesses, and farms to invest in and develop solar projects.

To propose a solution and avoid under-funding or closing other REF funded rebate and grant programs, we urge the Commission to use the Clean Energy Fund established by the settlement agreement filed June 10, 2015 in dockets DE 14-238 and DE 11-250. We recommend that the \$5million Clean Energy Fund be used in part now to stabilize the REF. On October 13<sup>th</sup>, 2017 Senators Bradley and Feltes submitted a letter to the Commission requesting that the Clean Energy Fund be deposited into the REF (a copy of this letter is attached). On November 7<sup>th</sup>, 2017 Representative Backus submitted a letter to the Commission in support of doing the same.



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We understand that the immediate process at hand to approve the proposed FY19 REF budget and approving the use of the Clean Energy Fund may be different and operate on different timelines. We share significant frustration about the lack of timeliness and lack of “collaborative process” thus far to include parties to the settlement in details of the use of the Clean Energy Fund.

Specifically, we request that the Commission use the \$1,750,000 in the proposed budget for the C&I competitive grant program to fund the C&I solar rebate program and that the C&I solar rebate program be open to new applications upon approval of the FY19 REF budget. We also recommend that the Commission direct Staff and OSI to work with the parties involved in the creation of the Clean Energy Fund with urgency to seek Commission approval to deposit the Clean Energy Fund into the REF to replace the \$1,750,000 to fund the competitive C&I competitive grant program in FY19 and the remaining \$3,250,000 to be used to stabilize existing programs in FY20, fund innovative renewable energy project grants and financing.

We propose this approach because a delay in the issuance of a competitive grant RFP will be less harmful to the NH clean energy industry and customers than the closing of a rebate program. We support making municipal, school, brownfield, and over-parking solar projects also eligible for the C&I competitive grant program as well as solar with energy storage projects. However, adding eligibility to the grant program should in no way be seen as replacing the rebate program.

We are ready and willing to continue working collaboratively with Staff to consider modifications to existing programs to ensure the REF is used judiciously, sustainably, and to most effectively encourage renewable energy development in NH.

Please feel free to contact us should you have any questions regarding our comments. Thank you for your consideration of this important matter.

Madeleine Mineau  
Executive Director  
Clean Energy NH



# The Senate of the State of New Hampshire

107 North Main Street, Concord, N.H. 03301-4951

October 13, 2017

17 OCT '17 PM 4:19

*Via First Class Mail and Hand Delivery to:*

Debra A. Howland, Executive Director  
N.H. Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301-2429

**Re: *Recommendation for the Clean Energy Fund, DE 14-238 & DE 11-250***

Dear Secretary Howland:

The Settlement Agreement filed June 10, 2015 in dockets DE 14-238 and DE 11-250 establishes a Clean Energy Fund. The Clean Energy Fund was approved by the New Hampshire Public Utilities Commission on July 1, 2016 in Order 25, 920. The relevant provision concerning the Clean Energy Fund provides that:

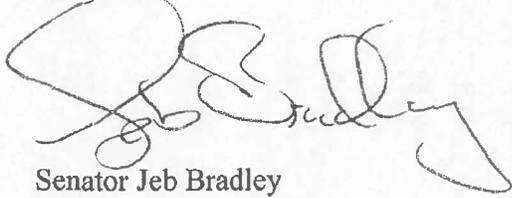
Upon closing on the RRBs, PSNH agrees to provide \$5 million to capitalize a Clean Energy Fund, such amount not to be recovered from customers. Details regarding the Clean Energy Fund will be established via a collaborative process overseen by Commission Staff and the Office of Energy and Planning. General principles governing the uses of the Clean Energy Fund and any programs supported by the Fund will include but not be limited to: innovation in achieving clean energy benefits; leveraging of various sources of funds including attracting private capital to the fund and to programs supported by the fund; expanding access to clean energy across customer classes in a cost-effective manner; and avoiding undue administrative costs.

*See* Settlement Agreement, pp. 24-25, ll. 649-657. We write with a recommendation with respect to this provision. Because of the significant need in the Renewable Energy Fund and because it is consistent with the principles of the above provision, we respectfully recommend the \$5 million be deposited into the Renewable Energy Fund and be treated in accordance with the provisions of law governing the Renewable Energy Fund as of the date of this letter.

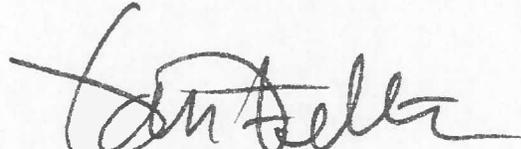
We would also ask you to consider an upper income eligibility limit that above which an applicant with very high income would not be eligible for grants from the residential portion of these monies.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeb Bradley". The signature is fluid and cursive, with a large initial "J" and "B".

Senator Jeb Bradley  
NH Senate District 3  
Senate Majority Leader

A handwritten signature in black ink, appearing to read "Dan Feltes". The signature is cursive and somewhat stylized, with a prominent "D" and "F".

Senator Dan Feltes  
NH Senate District 15  
Democratic Policy Leader

Cc: Service Lists for DE 14-238 & DE 11-250 by email only