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I N D E X

PAGE NO.

SUMMARY BY MR. WIESNER (NHPUC)

3

PUBLIC COMMENT BY:

Megan Ulin

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P R O C E E D I N G

1
2 CHAIRWOMAN MARTIN: Okay. We are
3 here this morning in Docket DE 10-212, which is
4 the Commercial & Industrial Solar Rebate
5 Program. We're here to consider and take
6 public comment on possible modifications to the
7 Program.

8 And I will turn it over to Attorney
9 Wiesner to give us some background.

10 MR. WIESNER: Thank you, Madam Chair.
11 I'll try to keep this brief. Most of it is
12 covered in the Staff memo that was filed on
13 January 8th and proposes the modifications to
14 the Commercial & Industrial Solar Rebate
15 Program.

16 The Program has been closed since
17 July 3rd. The Staff is now proposing that it
18 be reopened. There is additional funding
19 available to cover both waitlisted projects
20 that were filed, applications that were filed
21 before the Program was closed, as well as new
22 projects.

23 I believe that with -- through
24 attrition, there is currently at least -- I

1 think our belief is there's at least now
2 \$890,000 available to fund this Program. So,
3 that's a significant amount.

4 However, recent history has shown
5 that the level of ACPs that are received every
6 year is fairly steady, but at a far lower level
7 than had been the case several years earlier.
8 And, as a result, Staff believes that it's
9 important to manage a limited pool of funding
10 through making modifications to the Program to
11 reflect current market conditions. And that is
12 the primary driver for the recommendation that
13 the amount of the incentive be lowered to
14 \$10,000 maximum/20 cents per watt.

15 That is the most significant
16 modification that's being proposed by Staff at
17 this point. But we are also proposing some
18 changes to the application process that would
19 simplify it in some respects, but would also
20 provide more off-ramps, if you will, to weed
21 out, if you will, projects that are unlikely to
22 move forward. And that's based on our
23 experience in administering the program over
24 the past several years.

1 For example, parties would be
2 required to respond to Staff inquiries over a
3 period of two weeks, to ensure that they have a
4 complete application that demonstrates their
5 eligibility for the Program. And, at the end
6 of the nine-month approval period, only a
7 one-time extension of 60 days would be
8 possible, if the applicants can meet the
9 applicable standard for getting an extension.

10 There are other detailed changes as
11 well, which are outlined in the memo. That has
12 been circulated to parties. It was developed
13 after a stakeholder session in December of last
14 year. And I think that the relatively small
15 showing this morning may indicate that
16 stakeholders feel they had an opportunity to
17 voice their opinions during that session, and
18 didn't necessarily feel the need to come and
19 speak to you today.

20 But we look forward to hearing what
21 stakeholders have to say this morning. And
22 I'll note as well that there's an opportunity
23 for written comments to be submitted by next
24 Friday, the 7th. And, once those comments are

1 received, we would seek to move forward quickly
2 to approve modifications, have the Commission
3 approve modifications to the Program, so it can
4 be reopened on a date certain, with an
5 opportunity for applications to be received,
6 and the potential for a lottery process to set
7 queue positions, if the Program will be
8 oversubscribed once those applications are
9 received.

10 So, that's sort of a high-level
11 overview. And, with that, I'll turn it back to
12 the Chair to entertain comments from the
13 public.

14 CHAIRWOMAN MARTIN: Okay. Thank you.
15 So, we will leave the record open at the end of
16 this until February 7th for the written
17 comments to be received.

18 And it looks like I only have one
19 person who wishes to speak this morning. It's
20 Megan Ulin?

21 MS. ULIN: Yup. Yes.

22 CHAIRWOMAN MARTIN: So, go ahead, if
23 you'd like.

24 MS. ULIN: Thank you. So, we had the

1 opportunity to provide feedback at the earlier
2 stakeholder session as well. And I believe
3 that we're in agreement that, based on the
4 funding for this year, the proposed changes are
5 reasonable and make sense.

6 We would like to advocate for seeing
7 a bit more of a path upward for the fund, if
8 more funding is available in future years. Our
9 thinking being that, in the past history of the
10 Program, typically, if there is funding
11 available, to continue it, it has continued.
12 And if there has not, then these discussions
13 have ensued to revise the rebate incentive.

14 And, given that the incentive has
15 decreased over the years, our concern is just
16 seeing it stay at the base minimum incentive
17 that is proposed here and not have a path
18 upwards.

19 So, our proposed solution would be to
20 have a tiered system, based on the amount of
21 funding available at the beginning of the
22 fiscal year, which would then determine the cap
23 level. Currently, it's capped at \$10,000. And
24 we know that the drop from a \$50,000 cap is

1 quite significant. While the \$10,000 still
2 does allow an incentive for clients and solar
3 customers to be able to move forward, and that
4 poses a bit of a barrier for some projects,
5 especially given other drops in incentives that
6 have occurred in the past years, including the
7 tax incentives, a lower RECs market and tariffs
8 that are affecting solar costs and alternate
9 net metering credit from 2017.

10 So, based on that, our -- we also
11 look back at the peak years of rebate funding
12 through the C&I Program, and noted that
13 approximately 100 projects were funded in the
14 peak years of the Program. So, taking those
15 numbers and budgeting for a growth based on
16 that, say, 100 to 150 projects that might be
17 funded through the Program on a yearly basis,
18 we came up with a proposal for a tiered
19 solution that said, if you had 1.5 million or
20 less in the fund at the start of the year, your
21 cap would remain at \$10,000; if you had between
22 1.5 and 3 million, your cap would increase to
23 \$20,000; if you had over 3 million, your cap
24 might increase to 30,000. And we think that

1 just would provide a little bit more of a path
2 forward for the program, perhaps more certainty
3 and less start-and-stop, if there happens to
4 be. And it would give projects between, you
5 know, 50 to 100 kW that are seeing a lesser
6 rebate right now, it would provide a more
7 robust incentive for them, if the funding was
8 there to support it.

9 And, that's all for me.

10 CHAIRWOMAN MARTIN: I may have missed
11 it. But, if you didn't say, for the record,
12 could you just say who you're here on behalf
13 of?

14 MS. ULIN: Yes. I'm here on behalf
15 of ReVision Energy.

16 CHAIRWOMAN MARTIN: Okay. Thank you.
17 Any questions?

18 *[No verbal response.]*

19 CHAIRWOMAN MARTIN: Okay. I don't
20 think that we have any questions.

21 Is there anyone else who would like
22 to speak?

23 *[No indication given.]*

24 CHAIRWOMAN MARTIN: All right. Thank

