

STATE OF NEW HAMPSHIRE  
PUBLIC UTILITIES COMMISSION

NHPUC 13FEB'20 PM 3:15

January 30, 2020 - 10:17 a.m.  
Concord, New Hampshire

RE: DE 10-212  
ELECTRIC UTILITIES:  
Establishing a Commercial and  
Industrial Renewable Energy  
Rebate Program.  
(Hearing to receive public comment)

**PRESENT:** Chairwoman Dianne Martin, Presiding  
Cmsr. Kathryn M. Bailey  
Cmsr. Michael S. Giaimo  
  
Doreen Borden, Clerk

**APPEARANCES:** (No appearances taken)

Court Reporter: Steven E. Patnaude, LCR No. 52

**CERTIFIED  
ORIGINAL TRANSCRIPT**

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# **I N D E X**

## **PAGE NO.**

*SUMMARY BY MR. WIESNER (NHPUC)*

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## **PUBLIC COMMENT BY:**

Megan Ulin

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**P R O C E E D I N G**

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

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

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

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

I believe that with -- through 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

1       you for your comments. And we are adjourned, I  
2       guess.

3                   *(Whereupon the hearing was*  
4                   *adjourned at 10:25 a.m.)*