

January 8, 2010

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 06-NSHP-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

DOCKET	
06-NSHP-1	
DATE	JAN 08 2010
RECD.	JAN 11 2010

Re: Comments on Proposed New Solar Homes Partnership Guidebook revisions (*Publication CEC-300-2010-001-CM*)
[Docket Number 06-NSHP-01]

Dear Staff,

Thank you for the opportunity to provide comments on the proposed revisions to the NSHP Guidebook. We appreciate the efforts that have been made to clarify program requirements and streamline the reservation and claim process. SunPower looks forward to working with the CEC to ensure the continued success of the program.

Lease

- Page 18 – It may be helpful if the CEC provides specific guidance/verbiage on how to document that rebates have “directly and exclusively” reduced the lease payments, since legal documents need to be finalized and fully executed prior to submission for claim.
- Page 19 - Please clarify that the recapture of the rebate is upon system removal and not termination.
- Equipment Purchase Agreement – In the event of a lease community, the CEC should expect that the solar supplier and the builder will enter into an agreement for the installation of systems that will either be leased or sold to the homebuyer. It is possible that a leased system will never be sold under a purchase agreement, so we propose that this requirement be modified so that installation contracts will also suffice.

Solar as an Option

- We recommend that reservations for option communities be initially reviewed at most six months after reservation to determine the viability of the reservation.

Calculator

- Extend the grace period after a new calculator is implemented from 30 to 60 days to submit reservations using the previous calculator.
- Increase the CFI azimuth range to 120°-270°, but do not change the default azimuth from 170°.
- Increase the CFI pitch range to 0:12- 9:12, but do not change the default pitch of 5:12.

Home Energy Rating System (HERS)

- **Allow one in seven solar HERS sampling for a sampling group of lots with different systems and PV Calculator reruns.** By not allowing sampling of different system sizes, a HERS rating is being triggered for most homes, with a significant cost to builder participants. This additional program cost can be considerably reduced by allowing sampling groups consisting of different system sizes and calculator reruns without, in our opinion, reducing the integrity of the sampling process.

- Provide rebate payees with a view into HERS registries to allow verification of uploaded CF-4R and CF-4R-PV information. Otherwise, payees will not have full confirmation that claims are ready to be submitted.
- Allow for the submission of multiple CF-1R-PVs with different system sizes to be approved with the reservation. This is to accommodate communities that offer various system sizes, where the exact system size for a home is not determined until the time of home sale. This will allow the HERS rater greater flexibility to create sampling groups based on the CF-1R-PV files available in the HERS registry.

Reservation/Claim Mechanics

- Reduce claim payment time to 30 days and consider making it an obligation provided the claim is accurate. The current statement that the Program Administrators “intend to make payments within 6 to 8 weeks” is placing a large financial burden on applicants.
- Eliminate the requirement for a signature on the CF-1R-PV form. This aligns with CSI.
- Accept an electronic submittal of the NSHP-2 for claims with an electronic signature (reduce paper waste).
- Eliminate requirement to provide a copy of the RNC program acceptance letter. Recommend that the NSHP Program Administrator correspond directly with the RNC Program Administrator to obtain acceptance letter.
- The NSHP- 1 requests a single building and solar permit date on the front page. Please clarify what date should be entered there for subdivisions, or exempt them from entering these single dates. Should the date be for the first lot’s permit, or when the final map is recorded, etc?
- On page 9 – The guidebook indicates that approved applications will largely be governed by the previous guidebook. Thus, all approved applications will not benefit from the many administrative improvements in the 3rd edition Guidebook.
 - We recommend that approved applications be eligible for the following administrative improvements:
 - assignment of administrative rights,
 - exemption from system size justification,
 - exemption from PTO, permit, invoice, payment submissions,
 - allowed to use electronic HERS document submission.

Web Tool Changes by Priority

- Please mandate consistent use of the web tool by all Program Administrators.
- File size limitations. Currently 1MB. Large documents such as maps and plans cannot be uploaded.
- Allow for bulk upload of reservation and claim documents to submit, as it is very time consuming to upload all documents one at a time. We print and submit everything via mail because of this.
- Refine project status references (i.e. “Received”, “In Process”, “More Information”). Make them more definitive and standardize. Currently inconsistent.

Shading Analysis

Please consider revising the small, medium, large tree height classification system to allow installers and HERS raters to use the exact mature height of the specific planted or planned tree. Installers and HERS raters currently identify each tree species, and then determine the exact mature height of the species using the tree guides referenced in the Guidebook.

The medium category for trees that are between 21' to 49' is the most considerable barrier. In some instances, trees that are in the 36' to 49' range pass the shading test because they are counted as 35', but in reality they would shade the array when mature. By allowing installers and raters to report the actual mature height, the program could prevent future shading.

Many of the common ornamental trees used that are used (and sometimes mandated) as street and front yard trees grow in the 21' to 25' mature height range. Since those trees are in the medium category, their mature tree height is counted as 35' for the shading analysis. In reality, many of those trees will never shade the array.

There are far more types of commonly used trees in the lower end of the medium tree height classification, which results in many over-reported shading impacts and reductions in rebate amounts, ultimately reducing program satisfaction and the success of the program. The current tree height classification system significantly complicates the solar and landscaping planning and reduces the selection of trees that builders and landscape architects have to plant and satisfy both the jurisdictions and Minimal Shading Criterion.

Sincerely,



Jim Dawe
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New Homes Division
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