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August 15, 2013

California Energy Commission
Dockets Office, MS-4
RE: Docket No. 06-NSHP-1
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED
06-NSHP-1

TN 71838
AUG 15 2013

RE: Comments on Proposed New Solar Homes Partnership Guidebook revisions (Docket Number NSHP 06-NSHP-1)

Thank you for the opportunity to provide comments on the proposed revision to the NSHP Guidebook. We appreciate your effort in streamlining the program's procedures and accepting the stakeholder's comment to make changes to the program that would benefit the program's participants.

In general PetersenDean supports the proposed revision to the following topics:

- Removal of the 180-day window between the issue date of solar permit and the certificate of occupancy
- Virtual Net Metering (VNM) – Standard Reservation Period
- Leases (Lease Fact Sheet/Addendum & 10% True-Up of NSHP Incentive)
- Incentive Decline Process
- Affordable Housing System Owner (Non-Tax-Exempt Entity vs. Tax-Exempt Entity)
- 10 Business Day Correction Period
- Removal of Equipment Purchase Agreement
- Removal of 50% limitation for Solar as an Option projects
- Calculation of increased funding requests
- Explore new incentive structures (Checklist of efficiency measures & ZNE)

PetersenDean is pleased to submit the following comments in response to current proposed guidebook.

REMOVAL OF THE BUILD-OUT SCHEDULE AND PROGRESS REPORT TO IMPLEMENT THE AUTOMATIC RESERVATION DECREASE

- **CONCERNS:** The NSHP reservation periods are based on the project types which has a reservation period of 18 or 36 months. What would be the driving factor to determine if the project is still active? At what point of the reservation period would the NSHP administration utilize the automatic reservation decrease?
- **RECOMMENDATIONS:** To determine if the project is active, the designated entity would check to see when the last payment was submitted and if it is deemed that there has been no activity from the 180 day mark last payment request received this would prompt the designated entity to contact the applicant to request status of the project before moving forward with the automatic reservation decrease.

EXPLORING FLEXIBILITY OF RESERVATION FUNDING AT A PROJECT LEVEL RATHER THAN THE SUM OF SITE INCENTIVES

In reference to subdivision projects, the CF1RPV is generally run using the CFI method. However, throughout the reservation period as the solar systems are being installed we do face situations where there are installations that may fall out of the CFI criteria thus increasing or decreasing the solar rebate. Based on the current guidebook, the downside of having a reservation based on a lot by lot incentive is knowing whether a system size increases due to a potential homebuyer selecting a system size larger than the one reserved or situations where the solar components may have changed due to non-availability from the manufacturer in which we are faced with the extra incentive being placed on the processing list. PetersenDean currently has projects where the incentives

requested were slightly higher than the reserved amount and placed on the processing list and which are still sitting on the processing list a year later from the date the payment request was submitted.

- **CONCERNS:** Which entity will be held accountable for tracking and notifying the applicant of the remaining balance of reserved funding for their project, as well as which method of accountability shall be used to determine the balance of the reserve funding for each project? Assuming that the applicant will be given an option to apply for extra incentives to complete the reservation, at what point will the applicant be able to apply for extra incentives should the balance fall below the actual estimated per site incentive that is pending payment request submittal.
- **RECOMMENDATIONS:** The NSHP web-tool provides a location within the project displays the balance of the reserved funding to enable the applicant easy access to view their balance and know that they will need to apply for extra incentives which may be placed on the processing list.
 - If funds are placed on the processing list, the information within the NSHP web-tool should provide the listed date and amount placed on the list.
 - Retroact all reserved projects that have more than 24 months left on their reservation.

90 DAY CORRECTION PERIOD

Support the CEC proposed revision providing this is a 90 **business** day correction period.

PARTIAL PAYMENT OPTION

PetersenDean has a few CAHP projects in which the HERS rater finds the project's CF1R did not match the CF6R or the as built which results in having the project re-tested.

- Incidents PetersenDean have encountered as of late (separate incidents):
 - The rater has found on the CF1R (2) HVAC units in a single family dwelling which was incorrect and the CF1R had to be re-run with the correct info.
 - The rater received a copy of the CF1R from the builder and determined the CF1R provided to him did not what was in CalCERTS, resulting in a CF1R re-run because the homes were already occupied and the builder did not want to inconvenience the homeowner and/or it was too late to test the particular measure.

Due to CF1R changes several things may occur, but may not be limited to:

- Previous tested lot results are deleted which deletes the CF6RPV from the registry (providing the CF6RPV was attached to that particular lot that was untested on the energy efficiency side) therefore; the CF6RPV cannot be uploaded to the lot until the energy efficiency portion is complete.
- Depending on the purpose for the CF1R to be re-run, there is a possibility that the project will be subjected to plan-check and the affected plan will need to be uploaded to CalCERTS.

These incidents have resulted in delaying PetersenDean being able to complete the NSHP payment process. The time delay were roughly 6 months to a year before PetersenDean could submit the payment request.

PetersenDean offer builders a choice of paying net of gross system cost (minus rebate); therefore, the builder will assign the rebate payment to PetersenDean. Builders are reluctant to pay gross when these issues occurs regardless who is at fault and PetersenDean is unable to recoup the loss in a timely manner. The proposed changes offered by the CEC administration to pay out 70% of the NSHP incentive for those project that are having issues with the energy efficiency and hold onto the 30% until the energy efficiency portion has been completed is reasonable, therefore, PetersenDean supports the CEC proposed revision.

2013 BUILDING CODE - Updates to Tier I and Tier 2

- **CONCERNS:** As long as the Tier I and Tier 2 level meets the same requirement as the CAHP requirement to avoid confusion as well as frustration keeping up with 2 separate programs requirements.

LOCAL ORDINANCES EXCEEDING THE BUILDING ENERGY STANDARD

- **CONCERNS:** If all building jurisdiction does not require the project to exceed the Building Energy Standards who is going to be ultimately responsible for ensuring that project is being plan-checked, required data is being uploaded into CalCERTS and meets the NSHP's criteria?

ENERGY EFFICIENCY COMPLIANCE DOCUMENT - Documentation Author

PetersenDean understands the reasoning for the CEC proposed signage being done by anyone. Custom home builders are faced with this dilemma when the CF1R for a custom home was signed off by the architect or a non-CEPE or non-CEA personnel even though it was accepted by the local building jurisdiction, their project was not accepted by the NSHP administration resulting the CF1R having to be authored by a certified CEPE or CEA. If signature is required, it should be signed by an authorized energy consultant.

ADDITIONAL RECOMMENDATIONS**Forms**

- The CAHP program requires a copy of the Construction Plan-Set, CF1R, Data File and the Subdivision Final Tract Map. When a project is participating in the CAHP program, the NSHP administration does not request a copy of the Construction Plan-Set, CF1R and Data File. PetersenDean propose removing the requirement of submitting a copy of the *Subdivision Final Tract Map* for those projects participating in the CAHP program.
- Remove the requirement of mailing the wet-signed **NSHP-2** to the NSHP administration to complete the NSHP payment request to enable the applicant to defray the cost of postage.
- Remove the requirement of submitting the **NSHP-3** for each project; the installer and manufacturer warranty language can be added to the contract. PetersenDean creates a homeowner manual which is given to the builder to pass onto the homeowner at close of escrow. The manual contains a copy of the installer warranty and manufacturer warranty.
- Propose changes to the following areas on the **NSHP-1**:
 - *Occupancy Type*: Add "Affordable" to the list and remove the Affordable Housing under project type where it asks for total number of systems installed in the common areas and residential units.
 - *Project Type*: The way the list is presented on the NSHP-1 is very confusing; the project type should be fairly simple.

EXAMPLE of NSHP-1 regarding Occupancy and Project Type:

Occupancy Type: __Single Family __Multifamily __Mixed-Use __Nonresidential __Affordable Housing

Project Type:

- ☐ Solar as Standard (Solar Installation is a standard feature offered by the builder in a subdivision of minimum of 6 homes or more)
- ☐ Solar as an Option (Solar Installation is an optional feature offered by the builder in a subdivision of minimum 6 homes or more)
- ☐ Small Housing Developments with less than 6 residential units
- ☐ Common Area systems in a residential development
- ☐ Custom Home

Total number of residential dwelling units in the project: _____

Total number of common area systems installed: _____

Total number of residential dwelling units with solar energy system installed: _____

- PetersenDean propose removing the requirement of the author's signature on the **CF1RPV**; 99% of the CF1RPV would be generated by the solar installer



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NSHP Web Tool

- Allow projects to be deleted from the NSHP web tool that has not been submitted for a reservation.
 - For example, a project was created in the NSHP web tool not knowing that the project was located in a different utility which is not under the NSHP program. For example: the project is located in a jurisdiction where the boundary line is between PG&E and Merced and was found to be in Merced territory.
- Allow lots to be deleted from the NSHP web tool as a whole not one by one. Provide a button to enable one to remove individual lot or all lots from the project.
 - For example: the project was disapproved by the NSHP administration even though one may not have had to upload any additional forms when re-applying because the forms are still present in the web tool; however, the lots information may have changed and uploading a revised bulk workbook does not remove the existing lots therefore, the lots must be removed one by one.
- The processing list is not a helpful tool in determining if one of your lots is on the processing list because the incentive amount is lumped together under the NSHP Project ID. PetersenDean have several projects listed on the processing list and it is often difficult to determine if we have received the full indicated approved NSHP payment.
 - For sites with an increased incentive and placed on the processing list, PetersenDean recommends that the NSHP administration list the NSHP Site ID number on the processing list to enable the NSHP payee to determine the placement on the list.
 - For projects pending NSHP reservation would remain to be identified by the NSHP Project ID number.
- PetersenDean recommends the following be listed in the NSHP web tool when payment has been approved:
 - Approved payment amount
 - If extra incentive was approved and not paid at time check was issue to place the amount of the increased incentive that is listed on the Processing List along with date it was added
- Indicate and incorporate the current changes in the web tool as changes are made to the guidebook and/or program.
- If there are known issues with the web tool; please make a note on the web tool so that one does not have to reach out to the PA and/or CEC administration only to be told they are aware of the issue.

Again, we thank you for this opportunity to provide these comments and look forward to continued improvements and participation in the NSHP program.

If you should have any questions or need further clarification of any items in this letter, please do not hesitate to contact me at 707-392-4060

Sincerely,

A handwritten signature in blue ink that reads 'Carrie Ledo'.

Carrie Ledo
Lead Rebate Solar Administrator
PetersenDean Roofing and Solar