

**DOCKET**  
**06-NSHP-1**

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**Comments on CEC-Proposed Guidebook of June 6, 2007**  
**Ted Bardacke**  
**Global Green USA**

Global Green strongly supports the proposed guidebook changes with regards to the revised program for affordable housing. In particular, Global Green supports:

- The dual rebate structure with a higher rebate for PV systems that power residential units and a lower rebate for PV systems that power common areas
- Volumetric triggers for rebate reduction that decouple affordable housing from the mainstream rebate program
- The clarifications and definitions regarding mixed-use and residential common areas.

Global Green suggests the following changes and additions to the proposed guidebook:

1. The addition of an NSHP-AH form to assist the NSHP administrator in determining that projects meet the stipulated affordability requirements. This form can be filled out by the project applicant with the required information and the relevant regulatory agreement can be attached to it. The required information necessary to be included on this form is attached on the following page. This form, along with an appropriate regulatory agreement, should be submitted with the NSHP-1.6, the 6-Month Reservation Update Form.
2. The deletion of the requirement to provide the name and company of the HERS Rater on the NSHP-1. Many developers will not have identified this person at the time they wish to request a reservation. It is not clear why this information is necessary and/or useful. There is also no explanation or provision for changing this person later in the project. Would that change make someone lose their rebate reservation?
3. Clarification on the maintenance and monitoring agreement to indicate that monitoring of system output, regular cleaning of panels, and period removal of shading obstructions (if necessary) can be done by on-site property management staff and that such duties can be written into the overall property management agreement. The checking of electrical connections shall be done by an outside party once after 12 months of operation, and then every 5 years thereafter.
4. The deletion of the words "These levels are subject to funding availability" from page 30. We believe the entire program – not just the affordable housing portion – is subject to funding availability and there is no reason to single out affordable housing. We believe that the Commission retains its discretionary powers to alter volume and funding levels with the statement later on page 30 that "At the discretion of the Commission, this process will continue until total realized volume has been reserved or until funding is no longer available."

## Proposed Affordable Housing Regulatory Agreement Form

The PROJECT NAME project is an affordable housing project being undertaken pursuant to:

(Please mark all that apply:)

- Section 50052.5 of the California Health and Safety Code (affordable for-sale)
- Section 50053 of the California Health and Safety Code (affordable rental)
- Section 50199.4 of the California Health and Safety Code (TCAC-funded)
- Other Affordable Housing Law (Please state law or regulation) \_\_\_\_\_

PROJECT NAME contains NUMBER of residential units limited to residency by persons and households of extremely low, very low, lower or moderate incomes, as defined by the Health and Safety Code sections 50079.5, 50105, 50106, and 50093 et seq. and/or regulations adopted by the California Department of Housing and Community Development. These affordability limits will remain in place for at least 45 years. With the exception of management units, this equals NUMBER percent of the total units in the project.

Of these affordable units:

NUMBER units are reserved for extremely low income persons/households  
NUMBER units are reserved for very low income persons/households  
NUMBER units are reserved for lower income persons/households  
NUMBER units are reserved for moderate income persons/households

The attached regulatory agreement from the REGULATORY AGENCY NAME verifies the above information.

Signed:

Date:

Position:

Organization:

Contact Information: