

June 11, 2007

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

RE: Comments on CEC-Proposed Guidebook of June 6, 2007

Dear CEC,

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06-NSHP-1	
DATE	JUN 11 2007
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As a whole Old Country Roofing feels that the changes made to the NSHP handbook, in the June 6, 2007 Staff revision are a significant improvement over the original Final draft of December 2006. However we feel that there are several sections which need further clarification from the Commission in order for the handbook to be complete for production homebuilders trying to reserve funds for PV installations in their sub-divisions. Some specific recommendations are:

1. Pg 11: Section II, F, 1st sentence as currently proposed reads: "Eligible systems must be sized so that the amount of electricity that is produced offsets part or all of the customer's electrical needs at installation." This is grammatically ambiguous in that it could refer to the site of the installation or the time of the installation. Based on the original text of the December 2006 Final Handbook we suggest that the sentence should read "Eligible systems must be sized so that the amount of electricity that is produced offsets part or all of the customer's electrical needs at the installation location."
2. Pg 19: Section III, B, last paragraph currently describes the California Flexible Installation requirements. We are requesting that these be expanded in the following way: expand the azimuth requirements from 150° to 270° to 90° to 270° for a time limited to June of 2008 for not more than 15% of homes in the subdivision if solar is included as a standard feature (more than 6 homes in the development and more than 50% of homes with PV installations). Our experience with home builders has shown that architectural development of plans can take two years or more before a single home begins construction. Therefore the developments that are currently installing solar as a standard feature were not designed with the requirements of the NSHP nor the CFI in mind. We find that based on lot orientation, home plan fit to the lot, and available roof space that there are situations where the solar array can only be installed in a North of West (greater than 270°) or South of East (90° to 150°) orientation. We are asking for a temporary expansion of the CFI requirements in order to accommodate the time it will take for homebuilders to work with their architects to achieve the smaller azimuth range in the current CFI requirements.
3. Pg 22: Section IV, A, 1), c), 4th sentence as currently proposed states: "Applicants are encouraged to provide the construction plan-set in electronic format." As this is a new alternative to the construction plan submission please provide a description of the method of electronic submission (email, fax, website document upload, etc.) and the preferred (or required) document formats (.dwg, .pdf, .jpg, etc.)
4. Pg 22: Section IV, A, 1), c), last sentence as currently proposed states: "The construction plan set requirement will be waived for applicants who are participating in their electric utility's residential new construction energy efficiency program and submit proof

thereof.” As this is a new alternative to the construction plan submission, please provide an example of or a reference to the specific document(s) that would constitute proof of this participation.

5. Pg 23: Section IV, A, 1) e), 2nd Paragraph, 1st sentence as currently proposed states: “Applicants must submit each CF-1R-PV form and the associated input file in digital format...” This is essentially the same language used in the December 2006 Handbook and is still ambiguous. Please provide an explanation of what digital format, the CEC PV Calculator only provides this form in .xls format, and the method of submission. Please see item 2, above, for possible examples. In Appendix 6 in the June 6 revision of the NSHP-1 form it describes a .emf file format, if that is the preferred file format, please included a description in either the CEC PV Calculator or the Handbook of how to create this file format from the .xls file that is currently generated by the Calculator.
6. Pg 24: Section IV, A, 1), f), last paragraph as currently proposed states: “Applicants must submit the CF-1R form and the associated input file (e.g. *.bld or *.m7p) in digital format...” In this section it has been specified what file formats the digital submission must take, but again the location for that submission has not been specified. Please include a description of the email address(es), website location(s), or other submission method that the CEC would prefer be used.
7. As a general suggestion on the program, based on the lackluster response so far, we are suggesting that the rebate amount on developments where PV is offered as a standard feature (more than 6 homes in the development and more than 50% of homes with solar) be offered a \$2.80 / W rebate rather than the current \$2.60 / W. This is based on the extremely strong response that SMUD and Roseville Electric have had with their \$3.00 / W and \$4.00 / W, respectively, up front rebate amount. OCR understands that the higher rebate amounts are offered in part because of the lower cost of electricity in those areas which would otherwise increase the return on investment (ROI) time for PV system installations. However homebuilders don’t see and consequently don’t care about cost of electricity, they only look at the upfront cost of installing solar as a standard feature on the homes. OCR feels that increasing this rebate amount could make tremendous progress in successfully launching the NSHP.

Sincerely,

Bill Reaugh
Technical Services Manager
Solar Solutions Division