



4095 Del Mar Ave #3, Rocklin CA 95677

Office: 916-624-0535 • Fax: 916-404-7410 • www.solarecityelectric.com

January 4th, 2010

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 06-NHSP-01
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET

06-NHSP-1

DATE JAN 04 2010

RECD. JAN 04 2010

Subject: Objection to Revision of NSHP Program Limiting Single Family System Size to 7.5 kW

Dear CEC Board Members:

Chapter II, Section F of the proposed revisions to the New Solar Homes Partnership Guidebook states "The maximum incentive paid for a system on single family residential units is limited to the first 7.5 kW AC of the system".

This limitation of the size of the photovoltaic system for which an incentive will be paid is unreasonable and contradictory to the intent of the NHSP program and the SB1 Million Solar Roofs bill..

It is the experience of our company – a solar photovoltaic integrator/installer since 2003 – that significant portion of those California residents constructing new homes and interested in installing a photovoltaic system to offset their electricity usage have electricity usage well in excess of that offset by a 7.5 kW AC system. Many new construction homes eligible for the NHSP incentive are larger rural homes using well pumps and frequently irrigating larger areas than an urban home, which increases electricity consumption. When these homes also employ electric water and space heating, the total electricity consumption is well in excess of what would be offset by a 7.5 kW AC photovoltaic system. We have seen homes where systems three times that size would not fully offset the electricity consumption.

It is our contention that the limitation of 7.5 kW AC discriminates against these homeowners and contradicts the intent to reduce California's dependence on imported fossil fuels. Homeowners should be, and have been since the outset of the net metering/solar rebate program in California, encouraged to offset as much of their actual electricity consumption as possible with photovoltaic energy.

Frankly, the NHSP program already discourages residents building new homes from installing photovoltaic systems with unnecessary bureaucratic and technical requirements that add cost without improving the system performance. Compared to a CSI rebate application, a homeowner is probably going to pay a minimum of an additional \$1,000 for a photovoltaic system involving applying for an NHSP rebate. A limitation of system size to 7.5 kW makes one wonder if this program is being intentionally undermined.

We strongly recommend that any limitation to single family home photovoltaic system size, other than that it not exceed that necessary to offset the total electricity consumption of the single family home, be eliminated.

Sincerely,

Rick Robins
Sales Manager

A handwritten signature in black ink, appearing to read "RR", is written over a white background.