



Solutions for a Sustainable World

DOCKET

06-NSHP-1

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Re: Comments on New Solar Home Partnership Docket No. 06-NSHP-1

To whom it may concern:

Incorporated in 1998, The Rahu Institute is a California-based, non-profit organization focused on greater use of renewable energy. Over the years, Rahu has participated in providing input to develop NSHP and other solar incentive programs in California. Recently we had the opportunity to actively participate in the New Solar Home Partnership (NSHP) program. As Owner-Builder, Executive Director Tor Allen, built a new house in Sebastopol and experienced NSHP first hand. Below are comments based on this experience and include observations on the marketplace.

1. New service department at local utility is completely disconnected from ENEM and interconnection process. There was no consideration of whether or not we would install a solar system on the house. This disconnect resulted in installing a new meter, that was later replaced when the solar system was approved through the interconnection process. These 2 approval processes should be done in parallel or be better coordinated.
2. The NSHP online application interface is not intuitive at all. This required a personal walk through with an account rep from PG&E. Consider developing several video tutorials on how to use this tool.
3. The NSHP and Calculator does not handle more than one orientation on a single project well. This required 2 calculator outputs for additional complicated documentation.
4. Our HERS rater chosen and submitted to the Program Administrator (PA) had difficulty getting access to the documents we had submitted.
5. the Online interface should automatically send an alert to the PA when a new file is uploaded. There is a sense of not knowing if the file has landed and if anyone has looked at it. This required emailing the PA each time there was a new file uploaded. The system should be able to provide some automated verification to both the builder (applicant) and PA.
6. There should be a cap on the cost to pay a HERS rater reviewer. We paid \$350, but this was expressed as a simple straight-forward case. (it was). Meaning that it can cost more.
7. There is an abundance of extra documentation and paperwork that makes this whole incentive program difficult to work with. The goal is to motivate greater energy efficiency before one can be eligible for a PV system. Energy efficiency levels have increased since the NSHP was originally born, such that meeting the current standard is similar to beating the 2005 standard by 15%. With relatively low

participation in NSHP thus far, the goal should be revised to increase participation. The new 2008 standards, plus locally adopted green building standards, are achieving the higher levels of energy efficiency that is desired.

8. The NSHP calculator works well, though it could be improved to handle multiple orientations per given project, better. The print out provides an inspector/reviewer, or even the homeowner, a reference point for what the system should be doing on a given sky and seasonal condition. This is good information.
9. Local building departments already verify T-24 compliance, and many now with green building compliance. Requiring an additional review by NSHP adds to cost and complexity for the builder. Eliminate the EE requirement from NSHP. It is handled elsewhere.
10. Consider raising the bar on T-24, for the next upgrade, allowing PV system performance to be counted in achieving the standard. This is the best way for easing off financial incentives. By the time the next standards go into effect, the NSHP funds should be depleted, and a self-sustaining Solar Rooftops for new homes should be in place. POLICY is a key element to making this happen. Integrating this into existing Title-24 policy is the simplest and least complicated method.
11. Currently not many local installers are aware of NSHP, or have a perception of it being overly complicated. Many installers we contacted for our own project were not aware of the NSHP or misinformed. A local affordable housing project underway, did not include solar, due to unawareness, despite being here in 'Solar' Sebastopol. We are working to change this for this project, but the rooftops would have been more compatible for solar if designed from the start. More & better advertising and education is needed. Video tutorials are an option.
12. Keep incentive levels as they are now, until see greater uptick in applications. The last tiers (below \$1/watt) quite possibly will see no action, unless the NSHP program is greatly simplified.

I hope these comments are of use in shaping the NSHP for greater success in the coming years. Please call or email with any questions.

Looking forward,



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