

Docket Optical System - Staff Workshop on the Proposed Revisions to the NSHP Guidebook

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Subject: Staff Workshop on the Proposed Revisions to the NSHP Guidebook
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Comments about proposed changes to the NSHP Handbook

It appears to me that the changes I object to is an effort to streamline the paperwork flow for the NSHP Program. Unfortunately this is at the homeowner's and contractor's expense. We already spend an inordinate amount of time and resources to insure the homes are in compliance with the T-24 and that the documents supplied to the NSHP program are in order (we are a PV Installer). We are deeply entrenched in confirming T-24's, having them re-run, working closely with the NSHP plan checker responding to their plan check comments, talking to the Contractor, Architect, Homeowner, T-24 Author etc. Contacting the HERS Rater to confirm QII inspections won't be missed (disqualifying homeowner from rebate). Having T-24's updated per the HERS Rater as needed when the home's specifications change, etc.. etc.. etc... I can't imagine why the NSHP would want to make this already extremely complicated Rebate process more complicated and discourage Homeowners from taking advantage of the Rebate.

The following are my thoughts:

Reservation to be submitted prior to walls being enclosed

- It typically takes 4 - 6 weeks to gather the required documents from all parties to submit for the Rebate Reservation. It is unrealistic to expect the construction of the home to be delayed while paperwork is being gathered.
- It is not uncommon for a project to already be underway and possibly already have sheetrock. Currently if there is a QII requirement we let our customer know. If they can have the T-24 re-run without the QII requirement (adding energy efficiency measures and/or adding additional inspections) then they can qualify. As long as the home meets/exceeds the energy efficiency measures it seems unfair to disqualify them due to the timing of the paperwork and sheetrock installation.
- Delaying construction for paperwork will cause undue stress and added costs for Contractors and Homeowners, they may choose not to put solar on the home as the time is of the essence coordinating schedules with all the different trades working on the home.

Must be permitted as a NEW BUILDING

- Many jobs are total rebuilds but because of technical zoning and planning requirements a permit is issued for a "Remodel and Addition". This will exclude a large number of jobs that are in the true sense of the word a New Build. The Jurisdictions are not going to change their protocol to suit the NSHP Program.

Building Permit for PV must be issued prior to Issuance of Certificate of Occupancy

- This appears to penalize Homeowners for deciding to add Solar to their new home. As long as all the energy efficiency measures of the home are confirmed it should not matter when the PV Permit is issued.

Thank you for your time.

Respectfully,
Bonnie

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