



Cogenra Solar Inc.  
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September 30, 2011

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 06-NSHP-1  
1516 Ninth Street  
Sacramento, CA 95814-5512  
(submitted electronically and via USPS)

Dear Madam/Sir:

**Re: Docket Number 06-NSHP-1**

As you may know, Cogenra Solar Inc. is a leading manufacturer of equipment for solar cogeneration arrays that generate both solar hot water and solar electricity (photovoltaic-based) from the same module. Our technologies are certified and listed for incentive payments in both the CSI thermal (SRCC OG100 certification #2010032B) and CSI electric programs (CEC listed, TUV Sud certificate #Z2 11 09 77166002). I am writing to request that solar cogeneration technology solutions, such as Cogenra Solar, be included as eligible technology for the New Solar Homes Partnership (NSHP) program.

Cogenra's solar cogeneration solution incorporates a one-axis parabolic tracker which, operating at low concentration factors, focuses the solar energy on a proprietary PV-thermal receiver. This enables our product to produce five-times more energy than a traditional flat PV module does; 1x as solar electricity and the remaining 4x as solar hot water. Our solutions are very cost effective because of this high energy collection and dual energy displacement of both utility gas and electricity. In addition to industrial and institutional customers, our solar cogen solution is oriented towards the multi-family portion of the NSHP program, whereby later we may also have a version of the technology suitable for single-family.

The NSHP Draft Guidebook mentions the goal to achieve 400 MW of installed PV capacity in California by 2016 to create a self-sustaining market for high performing solar energy systems. From our understanding, the NSHP program for PV on new single-home and multifamily housing does *not* have a Performance Based Incentive (PBI) component, but only an Expected Performance Based Incentive (EPBI), and only fixed, non concentrating panels are currently eligible.

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As our solar cogen product is a 1-axis tracking, concentrating solution, we are CEC-listed on the "List of Other Eligible Solar Electric Generating Technologies" which are eligible for other PBI but not for NSHP's EPBI.

From an NSHP implementation perspective, our solar cogen product offers the highest solar energy production for every \$ of incentive availed. This is because *we collect about 4 times the amount of heat for every kWh of PV electric generated; thus, for every \$ of NSHP program that our system generates we would be producing 5x more energy than regular PV.* So NSHP gets a 5x bang for the buck, so to speak.

Currently, we are engaged with numerous clients on multi-family residential projects for which our technology is extremely suitable and we are now finalizing a specific one with incentive amounts expected to exceed \$100,000, thus making the desired eligibility rule change quite meaningful to the project's economics.

With this letter we formally request that our solar cogeneration product be approved into the NSHP program either by opening the NSHP program to PBI (Cogenra is already certified for CSI PBI and hence similar to other PV modules for monitoring and reporting purposes) or allowing our solar cogeneration product into the EPBB. We are very much engaged with technical and policy groups at the EC and you will find us very willing to partner with them to clarify any open questions.

Please do not hesitate to contact me in case of any questions.

Yours sincerely,

A handwritten signature in blue ink that reads "Mani Thothadri". The signature is fluid and cursive, with the first name "Mani" and last name "Thothadri" clearly distinguishable.

Dr. Mani Thothadri

Sr. Director, Product Marketing

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