

DOCKET**06-NSHP-1**

11-9-11
Eagle Solar
3546 N Riverside Ave
Rialto, CA 92377

DATE NOV 09 2011
RECD. NOV 09 2011

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

Dear California Energy Commission,

We respectfully write to you with Eagle Solar's comments regarding Docket #06-NSHP-1.

We were recently made aware of the possibility of the discontinuation of funding for the NSHP program (apparently due to the expiration of the 'Public Goods Charge' as per proceeding #R1110003), which we expected to be discontinued in 2016 or when the MW steps were exhausted, whichever occurs first. The discontinuation of funding of the NSHP program will negatively affect the installation of solar projects in California.

Additionally, we believe that the proposed changes to the NSHP program as per Docket #06-NSHP-1 will also have a negative effect on the installation of solar projects in California, as outlined in our comments to the proposed waitlist criteria below (our comments in red).

1) "Complete rebate reservation applications that have not already been issued a reservation by the Energy Commission will be placed on the waiting list based on the time and date the application is submitted to the Energy Commission's program administrators. These program administrators are Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company. The Energy Commission is the program administrator for Bear Valley Electric Service."

Any complete rebate reservation application that is already on hand with the NSHP should be reserved per the normal course of action. If the NSHP is forced to go to a complete rebate reservation application waiting program, then it should be from some date now or in the future and only pertain to reservation applications submitted thereafter, as contractors and consumers were given no advance notice by NSHP.

4) "Incomplete rebate reservation applications will **not** be added to the waiting list and will be returned to the applicant. Applicants with incomplete applications may re-apply for program funding by submitting a new rebate reservation application. The new rebate reservation application will be subject to the requirements, including the declining rebate levels, of the Guidebook in place at the time the new application is submitted. "

Based on our experience, it is virtually impossible to submit a complete rebate reservation application which contains all items in the same packet. Plan sets must be sent on a CD separately from the other documents, which are uploaded via the webtool. If the CD is received before the other documents are uploaded, the program administrator may deem the application incomplete. If the other documents are uploaded before the PA receives the supplemental CD, the application may also be deemed incomplete. We propose that as long as all the documents have been received, less any which must be sent separately via CD, the application should hold a secure place in line and not be returned to the applicant.

5) "Requests for additional funding for a previously approved rebate reservation application, due to changes in the project design or the system size, design, or equipment, will be processed as a new rebate reservation application and placed on the waiting list based on the date and time that the complete application is submitted to the program administrator."

Due to equipment availability that may vary from the time the application is signed to when the project is actually installed, equipment changes occur from time-to-time after the rebate has been reserved. Rather than having applications be required to be resubmitted, we propose that the NSHP allow a variance of 10% of the rebate amount to account for equipment changes. If the variance in the rebate funding is greater than 10%, then the application would be processed as a new rebate.

6) "Rebate reservation applications on the waiting list will be processed on a first-come, first-served basis until available program funds are depleted. If additional program funds become available, these additional funds will be applied to the unfunded applications on the waiting list."

While we agree that rebate reservation applications should be processed on a first-come, first served basis, we respectfully would like to request clarity regarding the amount of funding remaining in the program and the amount of funding that has been requested by applicants but has not yet been reserved.

We appreciate the opportunity to share the above views on this docket.

Sincerely,

Eagle Solar