



December 23, 2011

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

PetersenDean, a roofing and solar company headquartered in California with operations in CA, AZ, NV, TX, and FL, has been actively providing roofing and solar systems to production homebuilders in California for many years. We are offering our comments to the upcoming CEC proceeding regarding the proposed revisions to the NSHP Guidebook, 4th Edition.

In general, PetersenDean supports the proposed revisions to the schedule of rebate steps in accordance with Reserved Volume, and the establishment of Tier I and Tier II incentive levels based on energy efficiency in market rate housing. In our opinion, all of the proposed changes represent positive steps forward to getting the program on track and making it more effective.

The proposed 55.3MW combination of Steps 1 & 2 appears to include the MW total represented in the wait list, including Additional Funding Requests. From the chart on page 36, one can infer that the 55.3MW will receive the Step 1 incentive level. It would be helpful for these points to be explicitly clarified.

In the table on page 6 of the draft Guidebook, there appears to be a typographic error. In the item "Initial Incentive Level", the incentive level for affordable housing residential units is stated as \$2.55/Watt, which differs with the chart on page 37, which states it as \$2.90/Watt. Similarly, the incentive level for market rate residential units is stated in the table on page 6 as \$1.75/Watt, which differs from the chart on page 36, which states the incentive as \$2.00/Watt.

Our staff has pointed out that in the earlier editions of the Guidebook, certain differences in documentation requirements existed that are not now fully supported in the NSHP database. We would strongly support efforts by CEC staff to allow the database to readily accept rebate claim documentation required for rebates reserved under the rules in earlier versions of the Guidebook.

We appreciate the efforts of the Commission and staff in working through the issues affecting the NSHP, and look forward to improved solar adoption in the new home sector in 2012.

Sincerely,



Bill Scott
SVP Solar Solutions
Petersen-Dean, Inc.