

January 4, 2012

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 06-NSHP-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

DOCKET

06-NSHP-1

DATE Jan 04 2011

RECD. Jan 05 2011

Re: Comments on Proposed New Solar Homes Partnership Guidebook revisions [Docket Number 06-NSHP-01]

Dear Staff,

Thank you for the continued opportunity to provide comments on the proposed revisions to the NSHP Guidebook. We appreciate all of the Energy Commission's efforts to streamline program procedures and willingness to receive stakeholder input to promote the increase of program participation. SunPower is excited about the new guidebook changes thus far, and looks forward to working with the CEC to ensure the continued success of the program.

It is apparent that the Commission has spent much time and consideration reviewing and implementing many stakeholder comments and specific requests to make changes to the program which would benefit the program participants. SunPower acknowledges that the current proposed guidebook addresses and clarifies many topics that have been unclear in the past, and there are also some proposed adjustments to the program which we see as significant improvement for all parties. Once again, we appreciate the support and the open forum the Commission always extends to the public to help advance the NSHP program. With that, SunPower respectfully submits the following comments in response to the current proposed guidebook.

Increases in system size for approved reservations will be funded at the incentive level in effect at the time the change request is made.

We understand the intention of this change, and the desire for NSHP to have increased and clearer visibility of funding and forecasting. We agree that this change would significantly help the program provide the stakeholders and participants with more accurate details about available funding. We request the following considerations be made to this proposed change:

Increases to a reserved system size will be eligible for incentive level in effect at the time of reservation approval, as long as the increase is not more than 20% of reserved system size (CEC-AC Watts). System size increases which exceed 120% of the original reserved system size will be funded at the incentive level in effect at the time of the change request.

In the case of Solar as Option communities, NSHP only reserves 3kW per home and in many Solar as Option communities the builder is offering multiple system sizes, some offerings over 3kW. The more ability the builder has to offer multiple system sizes, the more willing they are to commit to the solar offering and ultimately program participation. Builders want to be able to offer multiple system sizes in order to increase solar sales. By making the offering more diverse, they are not "forcing" a specific system size – and cost – onto the homeowner. If the homeowner does not want the one-size the builder is offering, they may opt out of purchasing the solar all together.

Additionally, we recommend revising the applicability of this change in the following way:

This change to be applicable to new NSHP reservation applications only. Existing approved reservations remain applicable to prior guidebook where increase in system size will be funded at incentive level which was originally approved under reservation.

Requiring this revision to be effective for existing reservations would greatly impact the ability to sell solar in existing solar communities. Many communities offer multiple system sizes, and even custom designs if a homebuyer wishes to upgrade solar. If we are required to now raise our prices on solar systems which we've been installing for homebuilders at a certain price for many years, this would potentially cause program withdraw from the homebuilder. We need to continue to focus on making solar financially viable for those builders who have supported and participated in this program for many years, and this change would impact a large majority of our current, successful, solar communities.

HERS Providers & Raters:

There are continuous struggles with program guideline compliance with 3rd Party HERS raters and the current HERS Providers. If a HERS certificate is not completed, no incentive will be paid. As the administrator of the reservation, SunPower spends significant amounts of time pushing the entire process through the pipelines, and feels a general sense of disorganization throughout the life of the process. There are a significant amount of players involved in order to pull all the pieces together, and there seem to be extreme inconsistencies from project to project – sometimes site to site. SunPower requests the CEC to take the lead in further process development and training workshops for all parties involved. This includes the CAHP Program Admins, plan checkers, NSHP Program Admins, HERS Provider, Energy Consultants, HERS Raters, Solar Installers, and anyone else who is involved or affected by the Energy Efficiency documentation preparation and validation. Further education on each step in the entire process is greatly needed.

We also request the CEC to provide assistance whenever there are issues or delays in the HERS registry process, helping to make sure NSHP reservations are moving along timely and the program is working as intended. The only purpose of a CF-4R-PV is for NSHP incentive claim. If there is no enforcement of this requirement to be executed effectively with the HERS raters and HERS Providers, there is a flaw in the program. The guidebook needs to address specifically the requirements and responsibilities of the HERS Provider, Rater, and Installer, and also address the path to resolution whenever the process is not being executed as intended.

Program Administration:

The following are recommendations in a continual effort to streamline the current administrative burden of the NSHP program:

- Allow for all documents to be submitted electronically, including NSHP-2s.
- Allow for the submission of multiple CF-1R-PVs with different system sizes to be approved with the reservation. This is to accommodate communities that offer various system sizes, where the exact system size for a home is not determined until the time of home sale. This will allow the HERS rater greater flexibility to create sampling groups based on the CF-1R-PV files available in the HERS registry.
- Eliminate the requirement for a signature on the CF-1R-PV form. Entering the Document Author information should be verification of who is responsible for the information.

Web Tool:

Webtool updates are vital to streamline administration. SunPower recommends the following webtool updates:

Provide Overall Project Information visible from Project Level, in a simple table format (applicable mainly to subdivision applications):

- Total Reserved Sites
- Total Paid/Unpaid Sites
- Total Reserved \$\$
- Total Paid \$\$
- Remaining Reservation \$\$

- Reservation Expiration date
- Where the project stands on waitlist if applicable

Ability to see a working log of all activity per project/site:

- Project & Site Creation Date
- Form Uploading Dates
- Project Submission Date
- IOU Acknowledge Receipt of Project/Site Application
- IOU Application Review Date
- Application Approval Date
- Claim Submission Dates
- IOU Claim Review Date
- Payment Data – Payment Date, Check Number

Other general recommendations to improve functionality:

- Allow for larger file upload than 1MB. Suggest 5MB cap.
- Allow for bulk upload of reservation and claim documents to submit, as it is very time consuming to upload all documents one at a time.
- Correct "Expired" reservation status. Reservations which were granted 1 year extension are beginning to "Expire" on the webtool, which prohibits updates to any site records within that expired community on the webtool.
- Create Solar as Option functionality, with ability to upload all potential solar homes
- Ability to upload CF1RPV's and .emf & .her files to each site in the webtool to eliminate confusion where multiple project CF1RPV's exist, and eliminate email transmittals.
- Enable notifications of key status updates
- Correspondence regarding each project/site to be initiated from the webtool and therefore recorded in the webtool. Currently, all correspondence done via emails which may or may not be categorized/organized for easy retrieval.

Again, we thank you for your consideration to these comments and look forward to continued improvements and participation in a successful New Solar Homes Partnership program.

If you should have any questions or need further clarification of any items in this letter, please do not hesitate to contact me at 916-783-5300.

Sincerely,



Merideth Griffith
Manager of Project Administration
New Homes Division
SunPower Corporation