

# STATE OF NEW HAMPSHIRE

## Intra-Department Communication

**DATE:** May 13, 2022

**AT (OFFICE):** NHDOE

**FROM:** Deandra Perruccio, Administrator, Sustainable Energy

**SUBJECT:** Request to Modify Application Processes for Renewable Energy Fund (REF)  
Renewable Energy Incentive Programs

**TO:** Jared S. Chicoine, Commissioner  
Joshua W. Elliott, Director, Division of Policy and Programs

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### **Recommendations Summary**

The Renewable Energy Fund (REF) is a dedicated, non-lapsing, and continually appropriated fund the purpose of which is to support electrical and thermal renewable energy initiatives. This memorandum recommends modification of application processes for four REF-funded incentive programs:

1. Renewable Energy Incentive Program for Commercial and Industrial Solar Projects (C&I Electric Program) (prior PUC Docket DE 10-212);
2. Residential Renewable Electric Generation Incentive Program (Residential Electric Program) (prior PUC Docket DE 15-302);
3. Renewable Energy Incentive Program for Commercial Industrial Bulk Fuel-fed Wood Pellet Central Heating Systems (C&I Pellet Program) (prior PUC Docket DE 13-298);
4. Residential Bulk-fed Wood Pellet Furnace and Boiler Incentive Program (Residential Pellet Program) (prior PUC Docket DE 16-614).

Sustainable Energy staff recommend:

1. Removing notarization requirements for the C&I Electric Program, C&I Pellet Program, and Residential Pellet Program;
2. No longer requiring submission of social security numbers for the Residential Pellet Program and instead using the vendor registration process administered by the Department of Administrative Services (DAS), and
3. Permanently allowing electronic submission of all program applications for all four incentive programs.

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### Programs' Status and Background

#### Status of Electronic Application Submittals for Renewable Energy Incentive Programs

On April 7, 2020, Public Utilities Commission (PUC) Order No. 26,346, and on April 15, 2020, PUC Order No. 26,349, both issued as orders *nisi*, modified the application processes for the C&I Electric Program and the Residential Electric Program, respectively, in response to the COVID-19 state of emergency. Among other changes, those orders allowed rebate applications to be filed electronically on a temporary basis. The PUC determined that the application processes should be modified so that applicants had the opportunity to receive incentive payments in a more timely and efficient manner. Step 1 and Step 2 applications for those programs have continued to be permitted to be submitted solely through paper filings, if the applicant prefers.

Due to the smaller volume of applications, no changes were made to the C&I Pellet Program or to the Residential Pellet Program. Applications for those programs continue to be filed through paper submissions.

#### Status of Sensitive Personal Information for Residential Applications in Renewable Energy Incentive Programs

PUC Order No. 26,349 (April 15, 2020) also permanently modified the Step 2 application process for the Residential Electric Program by removing the need for applicants to provide their social security numbers as part of their applications. Instead, applicants now must register as vendors with the State of New Hampshire through DAS. The order determined that modification of the Step 2 application process would streamline that process and enable secure electronic submission by eliminating the need for the agency to receive and maintain applicants' social security numbers.

The Residential Wood Pellet Program currently requires that original signed rebate applications be mailed to the DOE. The application contains a page requiring the applicants to provide their social security numbers. Those applications therefore cannot currently be submitted as electronic copies through email based on security concerns.

#### Status of Notarization Requirements for REF Renewable Energy Incentive Programs

PUC Order No. 26,075 (November 20, 2017) removed the notarization requirement for applications in the Residential Electric Program “[t]o reduce the administrative burden associated with Residential Program incentive applications.”

The C&I Solar Program, C&I Pellet Program, and Residential Pellet program currently require notarization of rebate applications.

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### Department of Energy Authority

On July 1, 2021, the Department of Energy (DOE) came into existence and many functions previously performed by the PUC were transferred to the DOE. Under RSA 12-P:14, “[e]xisting rules, orders, and approvals of the [PUC] which are associated with any functions, powers, and duties, transferred to the [DOE] pursuant to RSA 12-P:11 or any other statutory provision, shall continue in effect and be enforced by the commissioner of the [DOE] until they expire or are repealed or amended in accordance with applicable law.” *See* 2021 N.H. Laws Chapter 91 (House Bill 2-FN-A-Local).

Under RSA 362-F, as amended effective July 1, 2021, the DOE is now responsible for administration of the Renewable Portfolio Standard and REF-funded programs. The DOE therefore is authorized to enforce the relevant provisions of the Puc 2500 rules. *See* RSA 12-P:14. The four REF-funded incentive programs are established under RSA 362-F:10 and modifications of related application and administrative processes now may be made by the DOE.

### Staff Recommendations

#### Application Process Simplification

In light of the successful transition to electronic filing for current programs allowing such submittals, as well as the improved processing efficiencies and reduced administrative burden to both applicants and DOE staff resulting from previous similar changes to the Residential Electric Program, Sustainable Energy staff recommend making the following application process modifications:

1. Remove the notarization requirement for the C&I Electric Program, C&I Pellet Program, and Residential Pellet Program;
2. No longer require submission of social security numbers for the Residential Pellet Program and instead use the vendor registration process administered by DAS; and
3. Permanently allow electronic submission of applications for all four programs.

The staff recommends that applicants be allowed to continue to submit applications through paper copy filings if they prefer, but note that longer processing time should be expected for paper submissions.

#### Program Transition Provisions

Sustainable Energy staff recommend that the program modifications described above become effective on a specified future date in order to allow enough time for the Step 1 and Step 2 application forms to be revised, as well as to ensure that applicants will have sufficient time to gather and submit any additional or different information, or comply with any different processes, that are required as a result of those changes.