

Re: SB 270 LMI Program

To Whom It May Concern,

Introduction

Standard Solar respectfully provides these comments on the Request for Public Comment issued by the New Hampshire Department of Energy (NH DOE). Standard Solar offers the recommendations below for the DOE to consider as it develops the guidelines for the SB 270 LMI Program.

Overview

Founded in 2004, Standard Solar is a national leader in the development, funding and long-term ownership and operation of commercial and community solar assets. Standard Solar owns and operates more than 400 megawatts of solar projects across the United States and historically has been active in the state of New Hampshire.

Recommendations

Standard Solar would like to raise concerns regarding the RFP Process as well as the RFP Eligibility and Scoring Criteria within the Straw Proposal.

To begin, in §A(1)(b), Standard Solar supports the annual RFP process as mentioned in the stakeholder sessions. However, we suggest a 60-day window to submit applications and a maximum 30-day window for projects to be awarded. By doing so, projects can be developed faster and thereby provide benefits to eligible customers sooner. A four-to-five-month RFP window, as originally proposed, is too long and could potentially cause projects to go stale.

Furthermore, in §A(3)(b)(2), Standard Solar proposes that if the 6-megawatt limit for EAP program is not reached on an annual basis, the remaining capacity should be rolled over to the next calendar year. In doing so, the SB 270 LMI Program will not

limit benefits to eligible customers and will allow maximum growth of solar within the state of New Hampshire.

Finally, in §B(1)(c), Standard Solar emphasizes that it is of utmost importance that the market sets the On-Bill Credit going to eligible participants. Given the competitive nature of the industry, the market will determine a fair rate that incentivizes developers to reach the program capacity. Additionally, the language of the statute does not indicate a specific OBC percentage, therefore it is arbitrary to set the minimum to 25%.

Conclusion

Standard Solar appreciates the opportunity to provide comments on the SB 270 LMI Program and requests that the NH DOE considers and adopts the recommendations herein.

Sincerely,

Trevor Laughlin
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Standard Solar