



## CLEAN ENERGY NH

Your Voice in All Energy Matters

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To the Department of Energy,

Clean Energy NH (CENH) appreciates your thoughtful and prompt work on the implementation of SB 270. This program has the potential to unlock both bill savings, emissions reductions, and public health benefits in the state of New Hampshire.

Regarding the Department of Energy's (DOE) straw proposal (the Proposal) for the implementation of SB270, CENH offers the following feedback:

- **RFP Scoring:** The Proposal suggests that the primary factor for scoring will be the “the total percentage of on-bill-credit [OBC] to EAP-eligible participants.” Later in the RFP, the DOE states that this factor will be based on the “proposed total % OBC to EAP-eligible LMI participants.” While CENH agrees that the selected projects should maximize benefits to EAP recipients, we respectfully suggest that the DOE consider other scoring criteria in the RFP process that seek to ensure that projects are located within municipalities that are most in need of increased property tax base, such as:
  - Total number of customers in a given zip code who are EAP recipients.
  - Location of a project within a state designated [Opportunity Zone](#).
  - Preferential treatment for projects in communities with high local education property taxes.
  - Preferential treatment for projects in communities without another already designated LMI solar project within the same zip code.
- **RFP Eligibility:** The Proposal suggests that “project maturity thresholds” such as “site control, financial viability, environmental permitting approvals, demonstrated bidder experience” “would apply.” However, it is unclear how these various and disparate criteria would be evaluated. Especially given the consideration that the question of eligibility is a binary, the DOE should consider clarifying this list. CENH offers the following suggestions:
  - Both site control and reception of environmental permits should either be required for eligibility or should not be required. CENH suggests that both should be required.
  - Financial viability and demonstrated bidder experience will require subjective evaluation by DOE staff. If these are important factors in determining which projects to select through the RFP, the DOE should consider making them part of the scoring criteria, and not part of the eligibility thresholds.

On the whole, CENH finds the straw proposal to be well thought-out, and in-line with the spirit and letter of SB 270. We hope that the DOE finds our feedback to be helpful and constructive, and are happy to provide further clarification upon request.

Sincerely,

Sam Evans-Brown  
Executive Director