STANFORD CARR DEVELOPMENT, LLC

July 31, 2009

Public Utilities Commission 465 South King Street, #103 Honolulu, Hawaii 96813

Regarding: Docket 2008-0249

Dear Chairman Caliboso,

First of all, thank you for allowing us to express our concerns with regards to the Commission's July 01, 2009 decision to adopt the RSWHS (HECO program) as the State Standard for Solar Water Heating System.

The intent of the Clean Energy Initiative is to derive 70% of the State's energy demand from renewable energy resources. Including the **OG-300 standard** into the State's RSWHS standard will definitely enhance the State's efforts in achieving this goal.

I humbly request that this decision be reconsidered and amended to include the Solar Ratings Certification Corporation's (SRCC) **OG-300** standard for the following reasons:

Opportunity to have more Affordable SWH systems available to homeowners

The **OG-300 standard** will provide homeowners with lower priced, cost effective and energy efficient solar water heating system to meet their energy needs and budgets. Savings in the **OG-300 system** is realized in both the purchase price of the unit as well as in maintenance cost when compared to systems under the current RSWHS

Standards (under \$4,000 before any tax credits!)

Lower Cost to Homebuilders and homeowners

Under Act 204, SWH systems will be mandated in new home construction in 2010. The current SWH systems that are approved under the RSWHS standard are projected to add \$4,000 - \$10,000 to the cost of a new home. New homeowners will also be burdened with the added cost of annual maintenance/service that is needed on these systems. The **OG-300 system** will provide homebuilders and homeowners with a cost effective alternative SHW system to minimize the cost of homeownership.

Including the OG-300 system into the RSWHS Standards will result in more Hawaii homes with SWH systems that will reduce our dependence on fossil fuels and aid in achieving the State's intent on clean energy.

Sincerely,

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Stanford S. Carr