



SOLAR ENERGY INDUSTRIES ASSOCIATION

COMMENTS on 225 CMR 14.00 RULEMAKING

March 20, 2013

The Solar Energy Industries Association (SEIA) welcomes the opportunity to submit comments on the proposed revisions to *225 CMR 14.00*.

SEIA appreciates the leadership Massachusetts has demonstrated in expanding renewable generation and attracting investment to the Commonwealth.¹ The results are material and evident. The Massachusetts solar carve-out has attracted a wide variety of customers, investors, and developers.

Massachusetts has over 220 MW of installed distributed solar generation capacity, which positioned it seventh among all states at the end of 2012.² There are over 200 solar companies now located in the Commonwealth. These companies include residential and commercial solar installation firms, as well as companies that manufacture the equipment used to create solar modules and other components of a solar generation facility. This has meant thousands of good new local jobs, direct and indirect, seasonal and permanent.

The average installed cost of solar generation facilities has fallen precipitously nationwide, just as the Massachusetts solar market is reaching a scale that is attracting significant investment,

¹ The Solar Energy Industries Association (SEIA) is the national trade association of the United States solar industry, encompassing all solar technologies, including photovoltaics (PV), concentrating solar power, solar heating and cooling, and other technologies. Through advocacy and education, SEIA and its 1,000 member companies work to make solar energy a significant energy source by expanding markets, removing market barriers, strengthening the industry, and educating the public on the benefits of solar energy. SEIA's membership includes many companies with installations, offices and facilities in Massachusetts.

² Solar Market Insight Report, March 14, 2013. GreentechMedia and SEIA. Executive summary available at <http://www.seia.org/research-resources/us-solar-market-insight-2012-year-review>

ensuring the best pricing and products for our citizens. The Commonwealth chose the best time to invest in the support of new solar generation and a local solar industry, because in this period of transition to a new, lower cost environment, the national solar industry is in the process of sinking deep roots in the states with viable markets.

SEIA supports all of the pending changes to 225 CMR 14.00. In particular, we would like to urge DOER to work quickly to implement its new authority to create a queuing process for SREC qualification, as this may be needed sooner than had been anticipated, because of the fast pace of solar capacity growth over the last 12 months.