



March 1, 2013

Mr. Dwayne Breger, Ph.D.
Director, Renewable and Alternative Energy Development
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020, Boston, MA 02114

RE: Expansion of the Existing RPS Solar Carve-Out Program

Dear Mr. Breger,

Broadway Electrical Co., Inc. (Broadway) has been a participant of the Massachusetts RPS Solar Carve-Out program since its inception. This program has created a Win-Win situation for both the DOER in developing the Solar Photovoltaic market in Massachusetts to be one of the most robust in the United States and for Broadway as a stake holder in the program being a significant generator of photovoltaic solar power and a job creator employing licensed electricians.

Broadway Electric has benefitted greatly as a Massachusetts company due to the Patrick Administration and Legislature's support of the solar industry. As a result of this support Broadway now employs 120 people and plans to continue this growth in 2013.

The Energy Bill that Governor Patrick signed last July increased the Net Metering Cap up to approximately 700 MW. To complement and continue the growth of the overall program the RPS Solar Carve-Out Program should also be increased. Broadway believes the next step for the growth of this program would be to increase the cap to 1 Giga Watt (GW). This would provide stability in the market place and would be in line with the Administration's goals to keep Massachusetts as a national sustainability leader.

With respect to establishing a mechanism to provide development controls similar to what was put in place with the existing program, Broadway believes that the controls with the SREC Minimum Standard Adjustment along with the Price Support Auction Mechanism is a prudent method to maintain the check and balance. The adjustment of the Opt-in Term should be reviewed. Broadway believes that changing the Opt-In Term is detrimental to the stability of the program. The Opt-In Term is the same period of time that the debt lender will amortize the loan for the project. Due to the complexity of these transactions dealing with either a municipality or a private off taker, the time frame for a solar project to close its financing can be significant and exceed one year in duration. While you can plan on and possibly hedge against the value of an SREC, the reduction of the Opt-in Term interjects serious complications to economics of a deal in the very late phases of the evolution of a project.

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Broadway applauds the great work of the Administration, the DOER and the State Legislators for being proactive having the forethought to develop and create The Green Communities Act and the Renewable Portfolio Standard Solar Carve-out program. The success of the program is providing a stable clean source of energy for the future in addition to much needed quality jobs in the State of Massachusetts.

Broadway remains available to meet and work with the DOER and the other Stake Holders to seamlessly bring the new program on line in conjunction with the existing RPS Solar Carve-Out program.

Regards,

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