

Hi Mike,

My comments to the proposed changes to 225 CMR 14.00 are fairly brief so I figured it would be more efficient to e-mail you. The below comments all have to do with the proposed Assurance of Qualification program:

Generally, if possible, the assurance of qualification program should be coordinated with the net metering assurance program- even if to the point of using the same consulting firm and registration process. The process of getting a large solar pv development to the point of construction in MA has now become rather cumbersome and costly. While Soltas appreciates the steps the state is taking to provide these "assurances" the process and the associated expenses (including the immediate payment of bills - for instance interconnection construction costs - that the process triggers) on top of all the local, state, utility, permissions is becoming somewhat burdensome

Combining the SREC assurance program with the net metering credit assurance program makes sense as both programs seemingly incorporate identical criteria - as proposed. This could also potentially reduce expenses for developers (the fee to get the assurance in particular) and bring a level of cohesiveness to the SREC and net metering programs which, thus far, in many ways track two different paths - both in terms of project standards and timelines.

More specifically - 14.05(1)(1-m)

(l). The Guideline should come out and the program launched as soon as possible. As you know, the clock for the expiration of the net metering credit assurance started some time ago. Many developers are hesitant to begin construction until assurances are given as to both SRECS and net metering credits. Unless the SREC assurance program is set up soon, many developers risk exceeding the timeline for their net metering assurance, especially given utility construction time estimates of 12-14 months in many cases.

(m) (3). This should be clearer and the actual permits listed. For example, every developer seeking town permissions for a ground mount needs to have a special permit and/or site plan review. Many need a conservation commission order of conditions. Some projects need permits from the Army Corps of Engineers. Some need to go through different town assessments, roll-back tax processes, etc.. The word "ministerial" is too subjective. The specific permits should be listed to limit uncertainty. I would recommend special permits/site plan review and conservation commission orders comprise the entire list.

On that note, "legal challenges" should to be clarified. Does this mean a simple agency appeal? To be honest, that sentence is confusing.

Thank you again for your efforts.

Sincerely,

Kirt

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