

Cedar Energy Investors LLC

October 7, 2013

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

Comments – Draft Guidance on Construction Timeline Extension

Dear Mr. Breger:

Cedar Energy Investors is an investment company that finances, owns, and operates photovoltaic systems via power purchase agreements and net metering purchase agreements for small-to-midsized commercial and institutional facilities, typically 50 to 250 kilowatts (kW). We are joining with partners to complete several projects in this range.

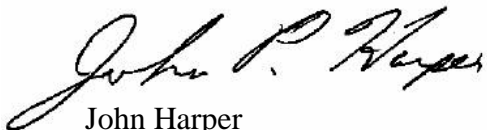
Thank you for providing an opportunity to comment on the Department's September 27 draft guidance for projects that have not received the authorization to interconnect or permission to operate from their local distribution company by December 31, 2013. Cedar Energy Investors understands that the guidance is to set out the procedures whereby such projects can obtain an additional extension as provided in 225 CMR 14.05(4)(k)4.b.

As currently worded, the draft guidance is focused on projects larger than 100kW, in line with the emergency regulations. We ask that DOER extend access to the extension option to projects with less than 100kW in capacity.

The Solar Energy Business Association of New England (SEBANE) notes in its August 6th letter to the Department notes that projects smaller than 100kW face the same approval and inspection obstacles to completion by the end of 2013 as larger projects. They also are exposed to the same uncertainty on the timing of the SREC II program. Accordingly, SEBANE recommends in its letter that the Department also accord the interconnection extension window to sub-100kW projects. We agree. Smaller projects up to 100kW should have the same opportunity as larger projects to qualify for an extension through June 30th under 225 CMR 14.05(4)(k)4.b.

We thank the Department's continuing efforts to support the Massachusetts solar market, and appreciate the opportunity to comment on the proposed guidelines.

Sincerely,



John Harper
Cedar Energy Investors LLC