



October 7, 2013

Solar Construction Guideline Comments

Greetings DOER:

SEBANE is the leading industry association in MA for residential and medium-scale, commercial integrators, financiers and manufactures. The Commonwealth has enjoyed unprecedented growth over the past several years and SEBANE again offers its thanks to Governor Patrick and the DOER for your effort to make Massachusetts into one of the world's leading solar markets.

Regarding the Emergency Regulations for the Solar Carve Out, SEBANE respectfully reiterates its request, on behalf of its members, that the RPS Solar Carve-Out Construction Timeline Extensions be made available to systems smaller than 100 kW as well as larger. Any number of delays could result in smaller commercial and residential, Massachusetts' business owners and residents missing the deadline through no fault of their own. Given the small number of total kW such an extension would entail, we believe the loss of SREC1 vintage would hurt Massachusetts' solar owners while the cost to provide this extension is small.

Thank you,

Thomas W. Thompson
On Behalf of SEBANE