

Dwayne Breger Ph.D.
Director , Renewable and Alternative Energy Development
Massachusetts Department of Energy Resources

BPVS, Berkshire Photovoltaic Services
46 Howland Ave, Adams Ma. 01220
Tel: 413 743-0152 E: cdk@bpvs.com

October 3, 2013

Re: Comments :GUIDELINE RPS Solar Carve-Out Construction Timeline Extensions

(Draft September 27, 2013)

Dear Director Breger,

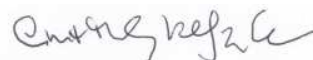
On behalf of my firm and our customer base thank you and your staff for promptly addressing issues affecting Solar Renewable Energy Certification eligibility (SRECS I) this year with Emergency regulation changes. Thank you for the opportunity to make these comments on a critical omission in the regulation guideline for Timeline Extensions .

The Department is correct to anticipate exigencies affecting the completion process of PV projects over 100 kW in progress during the Fall and Winter months of 2013 by setting an extended window for SRECS I eligibility assurance through June 7, 2014 as detailed in 225 CMR 14.05 .(4).k but neglects the under 100 kW category of solar installations affected by potentially the same problems. These problems were addressed in my comment letter of July 28, 2013.

In summary the regulation change omits the extension window framework afforded to projects over 100 kW for these smaller installations; as written, the Authorization to Interconnect for under 100 kW solar units must be in hand and the SQA application submitted "by the effective date of a new solar carve- out program established by the Department or by June 30,2014 , whichever is earlier" .

Whether the SRECS II incentive new program will be established for a January 1 , 2014 start date or later is not known . That uncertainty is at the core of the problem for construction of small systems in the pipeline anticipating SRECS I eligibility. The SRECS I eligibility extension through June 30,2014 should, to be fair also be allowed for small PV system installations with an Interconnect Service Agreement in place and meeting all the criteria afforded systems over 100 kW through this draft guideline . As I wrote in July, .." the scheduling and completion of jurisdictional inspection approvals required for utility completion documentation ,.. the inevitable delays caused by the crush of project completion submittals to utilities, and the weather window for installations from late October through the winter all present problems for small systems too". I note that SEBANE in its' July comments also called for this guideline to include small systems. Please include such language for the under 100 kW solar installation category in the final guideline.

Sincerely.



Christopher Derby Kilfoyle

CC: Senator Benjamin Downing