



**Comments on Proposed Changes to the RPS Class I (225 CMR 14)
as Regards the Solar Carve-Out II program
Submitted by: Metropolitan Area Planning Council (MAPC)
January 29, 2014**

The Metropolitan Area Planning Council (MAPC) would like to submit the following comments regarding the Department of Energy Resources (DOER)'s proposed changes to regulations governing the implementation of the RPS Solar Carve-Out II program (225 CMR 14).

- 1. Implications for municipalities.** DOER is seeking public comment on regulatory changes to 225 CMR 14.00 RPS Class I, which is a rulemaking that includes the implementation of the SREC-II program. MAPC has been working with cities and towns over the past few years to help them procure and move forward with EMS contracts for solar projects, most of which greatly depend on the pricing per kilowatt hour determined, in large part, by the Solar Carve-Out incentives. Under the process governed by MGL c. 25A, §11i, MAPC facilitated a solicitation of a solar developer for 17 communities in 2012, and we have been working with each municipality in the subsequent years to determine feasible municipal sites for solar. A number of these participating communities, as well as other municipalities in the MAPC region and throughout the Commonwealth, hope to construct solar projects on their capped landfills and brownfields. These land areas often have few other valuable uses and, while they will typically utilize less than two-thirds of the electricity produced for on-site load, they can provide a sizable amount of sustainable and affordable local electricity to the municipality. Based on our experience, we believe that the Department should consider raising the SREC factor associated with solar generation on capped landfills and brownfields, at least for public use, so as not to diminish the implementation of these projects or devalue them in the minds of developers, lenders, and other industry members.
- 2. SREC Factors Over Time.** Please confirm that an SREC Factor remains the same over time, or describe, if appropriate, how it could change, for example, if the interconnection configuration changes.
- 3. Definition of on Emergency Power Generation Unit.** We request that the Department provide more clarification regarding the definition of critical infrastructure. For instance, could this include water treatment facilities or schools used as emergency shelters?

Please contact Cammy Peterson, Clean Energy Planner, at cpeterson@mapc.org or 617-933-0791 with any questions on these comments.