



January 24, 2014

Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
Attn: Dwayne Berger, Director of Renewable and Alternative Energy Development

RE: Filed revisions to the 225 CMR 14.00 RPS Standard Class I regulation (SREC II Program)

Dear Mr. Berger:

I first want to commend you and your organization for everything you have done to make Massachusetts a leader in renewable energy. Massachusetts has built a sustainable future for our children and a robust industry with impressive job creation. Thank you for all you have done.

Regarding the recently filed SREC II program, I would further like to commend your organization from going away from the bidding process to the "first come, first serve" methodology of qualifying for the program. This was a critical change in the original plan as there are numerous developers who have invested very large sums of money and after years of work have finally received all the approvals required to proceed. It would not be just for them to be locked out.

Regarding the "first come, first serve", I feel luck should be taken out of the process and replaced with "first come" having a definition of "the application with the oldest approved, fully-executed Interconnection Agreement is the first in line (assuming they have their application in by a certain date)". After the application due date, projects should then be on a strictly first come, first serve basis. Lastly on this point, if a project does not receive allocation for a certain year they should stay in that same position in the queue for the following year's allocation.

The other item that I believe needs to be addressed is the allocation for ground mount systems should be dramatically increased. The Federal Investment Tax Credit expires in 2016, creating a huge drop-off in solar projects being built. There is also a build-up of projects since there has been no SREC program since June. All of these projects have permits, interconnection approvals and net metering agreements that will be expiring or running into contractual issues. Due to these facts I feel the ground mount allocation should be front loaded so the Governor can hit his goal of 1,600 MWs and developers will not be stuck with millions of dollars of projects unbuildable. To reach the Governor's goal and to be fair to the developers I feel an appropriate allocation number for ground mount solar projects is 100 MWs in 2014 and 120 MWs in 2015.

In summary, I feel the program is solid but will be a lot more just with a couple of tweaks. Making the "first come, first serve" a logical and predictable system a developer can rely on and unclogging the backlog of ground mounts by increasing their allocation in the early years prior to the halt coming in 2016 as the ITC expires.



I appreciate your consideration.

Sincerely,

Brett Chapman, Managing Director
CleanGen Partners, LLC