

East Light Solar, LLC
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January 28, 2014

Dwayne Breger, Ph.D.
Michael Judge
(DOER.SREC@state.ma.us)
Department of Energy Resources
100 Cambridge Street
Suite 1020
Boston, MA 02114

Re: Revisions to 225 CMR 14.00 (SREC-II)

Dear Mr. Judge;

East Light Solar, LLC hereby provides comments to the SREC-II Final Policy design.

The SREC factors were based, in part, on an Evaluation of Current Solar Costs and Needed Incentive Levels Across Market Segments dated as of July 12, 2013 prepared as Task 1 by the DOER as part of its SREC-II process.

The Evaluation assumes that Net Metering incentives will no longer be available after December 31, 2014 (Page 1). Accordingly, the Evaluation develops two levels of value for incentives: one value for a NM No-Cap Case and a higher value for a NM-Cap case (Figures 14 and 15). The additional incentive required for a project in the NM-CAP case is almost \$100/mWh in 2015.

As of January 24, 2014, the Public Net Metering cap has been reached for National Grid customers. The NSTAR Public Cap has 6-mW left.

The SREC Factors assume that net metering is available to all projects.

We request that the SREC-II Program acknowledge the demise of net metering by granting higher SREC Factors for Projects which are not able to Net Meter. This change would bring the Program into line with its underlying assumptions.

For example, if the auction bid price in 2015 is \$285/mWh and the additional incentive required by the Evaluation for a NM-Cap Case is \$100/mWh, the SREC Factor for a Market Sector A Project which was not able to Net Meter should be (a) 1.35 multiplied by (b) each mWh of Excess Generation. This Project would then receive an incentive worth \$385 for each MWh of Excess Generation, \$100/mWh more than a Project which is able to net meter.

Other Market Sectors would receive factors to provide the equivalent value of net metering on their excess generation.

This administrative change could be used to help replace the value of net metering as the Public and Private Caps are reached.

Thank you for your consideration.

Sincerely,

East Light Solar, LLC

By: _____

Mitchell H. Jacobs, member