



January 29, 2013

Mr. Michael Judge
Associate RPS Program Manager
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, Massachusetts 02114

Re: Regulatory Changes to 225 CMR 14.00 RPS Class I

Dear Mr. Judge,

On behalf of the cities and towns of the Commonwealth, the Massachusetts Municipal Association appreciates the opportunity to offer comments on the proposed RPS Solar Carve-Out II program. This incentive program is extremely important, as it will shape the next several years of solar development in the Commonwealth in every city and town. Municipalities have led the way in solar development, acting as true partners to ensure that Massachusetts ranks amongst the most successful solar states in the nation every year. Therefore, it is essential that the RPS Solar Carve-Out II program and other financial incentive programs encourage solar development that complements local needs and objectives.

In May of 2013, Massachusetts met its 2017 goal of installing 250MW of solar capacity well ahead of schedule. By the end of 2013, the state attained 361MW of solar capacity. Municipalities have led this early success, with over 120 cities and towns hosting solar installations on municipal land and almost every municipality with solar installations within its borders. The new target for 2020 is 1600MW, requiring 140-200MW of solar development per year to meet the goal.

The next phase of proposed incentives for solar development, the RPS Solar Carve-Out II program, creates four tiers of credits for different types of solar installations. The first tier with the highest credits includes small-scale solar installations with capacities under 25kW, which could include residential, parking canopy, emergency power generation, and community shared solar. The second tier of credits will be available for larger installations that are either roof-mounted or ground-mounted, and use at least 67% of the energy produced by the solar unit on-site. The third tier of credits will be available to solar installations on landfills or brownfields, or to units with a capacity of under 500kW on sites that use less than 67% of the energy produced onsite. The fourth and lowest-value tier will apply to all solar installations that do not fit into any of the first three tiers.

Many early large-scale solar arrays in our cities and towns were installed on capped landfills or on brownfield sites as a result of local preference. These sites are attractive candidates for the siting of solar arrays because they are often difficult to redevelop for other uses, and they do not

require the clearing of forestlands, which is attractive from an environmental and conservation perspective. The MMA respectfully requests that the DOER take every step to ensure that these sites remain attractive candidates for solar development by reevaluating the placement of these sites in the third incentive tier. Solar development in our cities and towns must continue in a way that meets local needs, and siting on capped landfills or brownfields should not be discouraged. The Solar Carve-Out II program must promote a robust development market across prospective sites, which is why we recommend that landfills and brownfields be placed in a higher incentive category.

The success of the Massachusetts solar development market relies heavily upon the financial incentive of net metering credits, and we urge you to develop the next phase of net metering policy concurrently with the Solar Carve-Out II program. As you know, the current net metering cap for municipal projects has been met with the number of projects in the queue right now. The cap for municipal projects was increased by the Legislature in 2012, but due to the overwhelming rate of success of solar development in the state, it should again be increased to ensure that municipal projects remain competitive with private projects.

Thank you very much for the work you do and for your consideration of our requests to keep municipal solar projects competitive in the next phase of solar incentive policy. If you have any questions, please do not hesitate to have your office contact me or Catherine Rollins of the MMA staff at 617-426-7272 at any time.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Beckwith', written in a cursive style.

Geoffrey C. Beckwith
Executive Director