



January 27, 2014

via email to DOER.SREC@state.ma.us

Dwayne Breger
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: SREC-II Final Policy Design Comments

Dear Mr. Breger,

The following comments are submitted by Sage Stone LLC in response to the proposed Solar Renewable Energy Credit, Second Phase ("SREC-II") final program design put forth by the Department of Energy Resources ("DOER") on January 3, 2014. Sage Stone appreciates the opportunity to comment on DOER's final proposal for the SREC-II program. Overall, Sage Stone supports DOER's final design for the SREC-II program. It is clear that DOER has taken significant time and effort to address stakeholder concerns regarding certainty and flexibility throughout the program.

In addition to our overall support for the SREC-II program, Sage Stone makes the following specific recommendations:

1. Clarify Definition of "Building Mounted Solar Generation Unit" in Section 225 CMR 14.02:

It is unclear how the "50% of the equipment used for generating power" will be measured under the following definition:

Building Mounted Solar Generation Unit. A solar photovoltaic Generation Unit with at least 50% of the equipment used for generating power installed on a building.

We recommend that this definition be modified to read:

*Building Mounted Solar Generation Unit. A solar photovoltaic Generation Unit with at least 50% of **the areal extent** of the equipment used for generating power (**excluding inverters, power transformation and transmission equipment**) installed on a building.*

Sage Stone appreciates the work done by DOER over the last several months to effectively develop the next phase of the SREC program. We are confident that the SREC-II program as proposed, with the suggestions included herein, will ensure the continued growth of the Massachusetts solar market. We would also like to express our strong support for the continuation and expansion of the Massachusetts Net Metering program, which continues to be an integral element of the Commonwealth's solar incentive offerings. In particular, we support an increase in the public Net Metering cap.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Kleiman".

Richard Kleiman