

January 29, 2014

Mr. Dwayne Breger
Director, Renewable and Alternative Energy Development
100 Cambridge St., Suite 1020
Boston, MA 02114

Re: **SREC-II Draft Revision Comments**

Dear Mr. Breger,

We would like to thank the DOER team for its efforts to address the situation with the Solar Carve Out program and the opportunity to provide comments on the draft revisions to 225 CMR 14.00. We feel the following changes will enhance and clarify the program.

Market Sector B:

We suggest adding a Generation Unit definition to this category which addresses ground mount installations that will be used for the benefit of the Town in which the ground mount is located. The draft, as currently written, would categorize a ground mount installation that has little on site load and uses Net Metering to benefit the Town to be in the Managed Growth Sector. As such, the project would not allow as much saving to the Town and be subject to delays in installation due to the inherent rules to qualify in this Sector in a timely manner. Some cities and towns do not have suitably owned buildings to host systems but they may have available land and can use Net Metering to gain savings. We feel categorizing these projects in the Managed Growth Sector is an unintended result and not in the spirit of what the regulation is trying to promote for the rate and tax payers of the Commonwealth.

Managed Growth Sector:

We agree with others in the industry who have voiced a concern that the current limits for CY14 and CY15 are too low. While we realize and appreciate the need to control this sector it seems as though projects that were already in process before SREC I became full are being unfairly penalized. These projects have a long development cycle and, if installed while the Federal ITC is still in effect, will help ensure that the Commonwealth reaches its RPS goal. We feel that frontloading, the sizing of this Sector deserves serious consideration.

Thank you for your consideration.

Sincerely,

James R. Dumas, Principal
Solect Energy Development, LLC