



January 23, 2014

Michael Judge  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Re: **SREC II Comments – 225-CMR-14.00**

Dear Mr. Judge,

We appreciate the opportunity to share comments on the DOER's proposed changes to the Massachusetts SREC program, referred to as "SREC II". It is our hope that the changes to the SREC program will enhance the ability to deploy smart distributed solar projects such as pole mounted virtual arrays that enable support grid reliability and provide the most benefit to the ratepayers of Massachusetts.

The market sectors factors provide a clear incentive to deploy such projects and we fully support this design. Smart distributed solar systems enabled with two-way communications provide flexibility to utilize areas of land that otherwise would be stranded. Smart pole mounted solar will enhance the command and control of the output of these facilities, while supporting grid stability and reliability in combination with renewable generation during peak load periods.

By defining the SREC factors the industry can portray the viability of projects to investors or financiers, which, in turn will better serve the market by allowing these opportunities to gain access to financing at competitive market rates. It is clear that distributed smart solar units are aligned with market sector A due to their distributed nature and ancillary grid value.

Petra Solar is in full support of this conceptual market design and look forward to the DOER implementing this design in the coming months.

Sincerely,

John McCauley  
Vice President of Sales (NE region)  
Petra Solar  
john.mccauley@petrasolar.com  
(732) 476-4218 mobile