

Dear DOER Team,

I write to support the positive "weighting" of solar assets which are co-located with critical municipal and private infrastructure / facilities in the current SREC II draft regulations (pages 6 and 35):

<http://www.mass.gov/eea/docs/doer/rps-aps/225-cmr-14-00-draft-regulation-tracked-changes.pdf>

Our company is actively engaged with a range of municipalities, public and private entities which seek to utilize solar PV to provide resiliency solutions and emergency power in the event of grid outages caused by a range of factors from increasing storm levels to flooding to ice storms. Enabling positive SREC weighting for such initiatives that will benefit emergency services (fire, police, EMT) and critical infrastructure / supply chain will increase the success and "financeability" of such resiliency initiatives.

From an operational perspective, solar PV, when "islanded" in a safe manner for facilities and the surrounding electrical grid, can provide redundancy and can supplement conventional back-up generation systems such as diesel and natural gas powered generators. Such approaches increase the "survivability" of communities by increasing the amount of time a given fuel supply can help power critical facilities during major outages such as Hurricane Sandy, in which the supply chain broke down and diesel fuel was not readily available in New Jersey. (Natural gas distribution systems were also taken out of service in parts of NYC during Sandy, which severely impacted natural gas fired generators). The emergency benefits supported by the current SREC II draft regs are clear. Solar also clearly provides a GHG emissions reduction and cost savings year round when not needed for resiliency purposes during outages and times of stress on the grid.

I would be happy to provide further detail to the DOER and/or DPU in the regulation drafting process if helpful. Please contact me if I can be of assistance.

Sincerely,

John H. Tourtelotte

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