

To The Massachusetts DOER:

First I wish to thank the DOER, particularly Dr. Dwayne Breger, Mike Judge, Bram Claeys and Commissioner Mark Sylvia for the hard work at crafting a refined and diligently tweaked SREC II program that emphasizes many of the State's goals in encouraging small scale distributed generation through a number of innovative incentives for solar pv. By using the factor system and promoting rooftop, residential, community shared solar and landfill/brownfield sites, the state is creating tiered incentives in the proper direction.

However there still are a few areas where additional improvement is possible.

I have spent a significant amount of time at SDA over the past two years focused on developing one of the first Community Shared Solar models in the Commonwealth with the Harvard Solar Garden.

I would recommend that the definition of Community Shared Solar have more clarification. In particular we hope that the definition does not allow for misuse of the Community Shared Solar category just by an LLC having multiple 'owners'. Maximum single entity ownership needs to be set at a reasonable level.

Additionally it would be a simpler metric to use a 25 kW share limit rather than the rough equivalent of 30 Mwh so as to size the capacity for the utility interconnection, MassACA and other requirements that are capacity based. I would also request that the new residential financing vehicles that are being developed include members of community shared solar in them.

I believe the Managed Growth Sector is woefully under supplied for CY 2014 at 26 MW and 2015 at 85 MW, Considering that there are likely at least that much capacity in the pipeline presently and perhaps more under early development, this would create a disincentive for further risk investment in this sector when over 80% of the past few years capacity came from this sector. It will be difficult if not impossible to achieve the Governor's goal of 1600 MW by 2020 at this level of managed growth, especially considering

that the Federal ITC of 30% will expire in 2016, leaving three years at an unknown level of Federal support for solar PV.

Although prices for modules, inverters and racking have declined precipitously over the past three years, it is not at all likely for this trend to continue at this pace and in fact, prices for modules over the past six months have leveled off and in fact have risen. In addition, the ISO predicts over 8300 MW of fossil fueled and nuclear generation will be retiring by 2020 and will need replacement by low or no emission generation. There are no single source solutions, but solar is one of the quickest sources of new generation to permit, site, build and interconnect. Solar PV creates local jobs, reduces transmission costs and supports the local tax base in a number of ways and therefore should be encouraged as much as possible in the early years, before the ITC expires. I recommend tripling the managed growth sector to 300 MW per year for the next three years at a minimum.

In terms of selecting which projects are selected for the managed growth program in the “first come first serve” method, this should not be based upon who has the fastest internet connection but rather based upon their effective ISA date, the earliest served first.

The landfill and brownfield category should also include emergency or disaster designated areas, such as from tornado or other storm damages. This category has more expensive site development costs than a greenfield and therefore should receive a 1.0 factor rather than a .8 to compensate for these additional costs.

Regarding Building Mounted Solar Generation Unit/Parking Canopy unit: at least 50% of equipment used for generating power installed on a building, what does “at least 50% of the equipment used for generating power” mean?

Please further define “Emergency Power Generation Unit”

Can the Department provide more clarification at this time regarding the definition of critical infrastructure? Could this include water treatment facili-

ties? Schools used as emergency shelters? Evacuation route lighting and traffic signals?

Replacement or relocation of units:

Many PPAs in MA require that the customer provide a new site for the project if the site becomes unavailable (e.g., the host building needs to be demolished). Depending on DOER's intent, it seems to follow that this section should include a provision for systems that need to be decommissioned and relocated (for reasons outside of the customer's control).

Assurance of qualification:

Guidelines on assurance of qualification pending; this guideline may exempt small systems and have a waiting list; Will it be subject to stakeholder review and comment?

Will there be a standalone queue for the managed growth category (14.05)(9)(m)(2), or will the assurance process only be administered at a program level?

Can a project's SREC factor ever change if, for example, the interconnection configuration changes?

Thank you for the opportunity to provide these comments and questions,

Sincerely,

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