

To Whom It May Concern,

Please accept these comments with respect to the draft "SREC II" regulations.

These comments are written on behalf of Reservoir Road Holdings, LLC ("RRH"). RRH has approximately 7 community solar projects, 5 MW of brownfields and landfills under contract and in the interconnection queue and another 4.5 MW of properties that have been fully permitted on a local level with executed ISAs for some time now.

These comments focus on two areas of the regulations in particular: the managed growth sector and the provisions regarding community shared solar

1. It is critical that the DOER "reward" those projects with, at the time of the issuance of the final regulations, executed ISAs along with all local permits with priority entry into the 2014 and 2015 managed growth programs. This follows the logic from the SREC 1 emergency regulations. Many developers, including RRH, have anxious landowners that been on hold for approximately a year now along with the municipal off-takers, subcontractors and others waiting on the these regulations. These projects are shovel-ready, financed and provide certainty with respect to eventual achievement of commercial operation. Further, the 2014 and 2015 queues for managed growth should both be established immediately upon issuance of the final regulations to reduce continued uncertainty in the project development marketplace.

2. RRH fully supports the proposed changes and recommendations of Clean Energy Collective with respect to Community Shared Solar, in particular, the proposed revision:

"Community Shared Solar Generation Unit. A solar photovoltaic Generation Unit that provides net metering credits to **ten** or more utility accounts, whose **participants** have a **beneficial** ownership **interest** in the **production of** the Generation Unit or the entity that owns the Generation Unit. **Each participant is known as a Subscriber and there are no limits as to the number of Subscribers per project. A single Subscriber's beneficial ownership interest may not be greater than 40% of the projects total capacity.** "

Sincerely,

Kirt Mayland
Managing Member
Reservoir Road Holdings, LLC