



January 29, 2014

Commissioner Sylvia  
MA Department of Energy Resources (DOER)  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Re: Comments – RPS Solar Carve-Out II

Dear Commissioner Sylvia:

Sustainable Strategies 2050 (Sustain 2050), in partnership with investors and developers, has been involved in and has completed the development of approximately 20 MW of solar projects across the Commonwealth. Sustain 2050 expects to continue to develop more projects in the Commonwealth - utility scale with a focus on brownfields and landfills, behind the meter installations for industrial/commercial customers, and community shared solar projects which will provide direct ownership stake to homeowners, local businesses, and municipalities. Sustain 2050 is grateful to DOER for its efforts to create a robust and sustainable solar market in the Commonwealth and appreciates the opportunity to submit comments on the RPS Solar Carve-Out II (SREC2).

**Annual Compliance Obligations Capacity Targets** - Given the short-term uncertainty with the State net metering program and the longer term uncertainty with the Federal ITC (which is scheduled to expire in 2016), it is critical that there be a level of certainty with the SREC II program that would allow investors to start developing projects in 2014/2015. Given the current capacity targets for 2014 and 2015, most investors do not want to take the risk of starting projects this year as they are not sure that they will be able to get through the development process and qualify under the proposed capacity targets. This has resulted in many projects either being put on hold or new projects not being pursued. We would highly recommend doubling the capacity targets for 2015.

**SREC Factor** - Because landfill- and brownfield-sites have additional challenges and costs associated with their development and given DOER's (and EPA and MA DEP's) intent of promoting the development of solar projects on these sites, we would strongly recommend giving these sites an SREC factor of 0.9.

**Community Shared Solar Generation Unit** - We would request the following revision to the proposed language:

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.**

The suggested revision above follows standards implemented in Colorado, Minnesota, Vermont and various other states and has been successful in broadening participation in Community Shared Solar, ensuring projects are not built for the benefit of a single subscriber, but rather to serve the broader market.

Sincerely,  
Rayo Bhungara  
President  
Sustainable Strategies 2050 LLC