



June 30, 2016

Commissioner Judson
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

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CLEAResult would like to take the opportunity to comment on the proposed changes to 225 CMR 16.00 Alternative Energy Portfolio Standards, filed on May 24, 2016, with regard to funding and its impact on eligibility.

The exact wording proposed at the bottom of page 13, Section 16.05 Eligibility Criteria for APS Alternative Generation Units (1) (a) 6.:

e. Combination of funding. If a Generation Unit receives funding in an amount exceeding 50% of the Generation Unit's total construction and installation costs, through one or more incentive programs administered by the Department, MassCEC, or both prior to [the Effective Date of this Subsection], the Generation Unit shall not be eligible to qualify in the APS.

We request additional specificity to the highlighted language. Please clarify whether utility incentives and rebates provided through the MassSave program would fall under the programs being administered by the Department (DOER), thus rendering a recipient project ineligible for APS Thermal credits.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Barrett".

Lisa Barrett
Program Consultant
Clean Energy Markets