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June 30, 2016

SENT VIA ELECTRONIC MAIL

RE: Alternative Portfolio Standard Regulations (225 CMR 16.00)

Dear Director Judge and Ms. Meserve,

SRECTrade appreciates the opportunity to submit written comments in regards to the recently filed Alternative Portfolio Standard Regulations (225 CMR 16.00). The inclusion of renewable heating and cooling to the Alternative Portfolio Standard will be a great addition to the Commonwealth's overall renewable energy portfolio, and SRECTrade supports the diversified growth of the Commonwealth's renewable energy industry.

In regards to 225 CMR 16.05(1)(a)6.b., SRECTrade supports the use of both forward minting and pre-minting of APS Alternative Generation Attributes, depending on the conditions of the market and as prescribed in 225 CMR 16.05(4). This optionality will allow the DOER to ensure the market does not become fundamentally oversupplied in future years by allowing for forward minting "in a Compliance Year in which the ratio of APS Alternative Generation Attributes settled for compliance to the APS Compliance Obligation from the Compliance Year two years prior was more than 0.75."

In the interest of further preventing oversupply in any given Compliance Year, SRECTrade recommends that the DOER adjust the useful life/APS eligibility of each forward minted or pre-minted APS Alternative Generation Attributes from one (1) to at least two (2) years, with consideration for a third year of useful life/APS eligibility if deemed appropriate based on the DOER's anticipated supply for the market. This extension will further ensure a Generation Unit Owner is able to monetize the Generation Unit's APS Alternative Generation Attributes before the Attributes' eligibility expire.

Finally, SRECTrade supports the Special Provisions for Aggregations under 225 CMR 16.05(3) and believes that utilization of aggregators will enable this market to grow much more efficiently and cost-effectively, as has been the case in the RPS solar carve-out market.

We thank the DOER for its consideration of our comments, and look forward to continued participation in the stakeholder process that lies ahead.

Best Regards,

A handwritten signature in black ink that reads "Allyson Browne". The signature is written in a cursive, flowing style.

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