



18 July 2017

TO: MA DOER  
[thermal.doer.state.ma.us](http://thermal.doer.state.ma.us)

RE: APS Comments

Sirs/Madams,

Per email from Samantha Meserve, we are submitting comments with regard to the current version of 225 CMR 16.00 Alternative Energy Portfolio Standard (APS) as follows:

With regard to "Combination of Funding" Section 6.e., in the case of solar thermal systems, is the intention to eliminate "double funding" for all projects so that if they qualify for the existing MassCEC rebate program they would not qualify for the new APS? We are a bit confused by the reference to an "Effective Date". See below:

*"e. Combination of Funding. If a Generation Unit receives any funding through a grant or incentive program administered by MassCEC or funding in an amount exceeding 50% of the Generation Unit's total construction and installation costs from a grant or incentive program administered by the Department or any other state agency prior to [the Effective Date of this Subsection], the Generation Unit shall not be eligible to qualify in the APS"*

Our suggestion is of course to allow for both sources of funding especially in cases where cheap natural gas is the fuel offset by the solar system. Even with existing MassCEC rebates, paybacks are long in these cases and additional APS benefits would help to greatly expand the customer base for clean renewable solar hot water systems.

Thank you for your attention.

Sincerely yours,

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