



Samantha Meserve  
Dept of Energy Resources  
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RE: APS

Samantha,

Please clarify the regulations for Combination funding in regard to Solar Hot Water

For example if a business owner of residential property owner receives a rebate from the Mass CEC covering 40% of project costs in July 2017 will they be eligible for AEC's ?

If the same customer receives 51% of project costs through the Mass CEC in July 2017 will they be eligible?

Projects that are for customers who are non-profit or low income receive a higher rebate which helps offset the fact that they don't get the 30% federal tax credit.

**So the issue we would like addressed is why put the cut off at 50% ?**

A for-profit commercial customer gets 40% of project costs covered by the Mass CEC rebate, a 30% federal tax credit, a \$1,000 Ma tax credit, accelerated depreciation and now the AEC's. This will finally allow Thermal to compete against historically low natural gas prices.

A non-profit customer gets up to 65% of project costs covered by the Mass CEC rebate, no tax benefits and no AEC's

This discrepancy penalizes non-profits and some low Income projects

We would suggest dropping the 50% threshold until such time as natural gas process rise above \$1.75/therm. This one adjustment will greatly improve paybacks and allow for a much faster track to the States Carbon reduction goals

Please don't hesitate to call if you would like more detailed information on this suggestion

Respectfully

Erica Boyle  
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Renewable Energy Systems LLC  
NABCEP Certified Solar Heating