

On behalf of the Mass. Energy Consumers Alliance, I am writing to make a few comments regarding the proposed SREC regulations. These comments are made in particular order:

- The market will be fairer and more efficient with more transparency. One example would be to frequently update the list of approved Statements of Qualifications. That way, buyers and sellers would have good information about the potential supply of SRECs.
- In several places, the regulations allow for too much uncertainty. We appreciate the fact that some features are designed to be flexible over time, but the level of uncertainty currently has many stakeholders unsure about how to finance construction and whether or how to buy. A better way to address significant market changes in the future may be to revise the regulations as circumstances warrant. In some cases, there may be benefits to simplifying the rules.
- There should be greater clarity and ease for aggregators to add and subtract arrays and total capacity over time as they enter the auction process. As systems are brought on-line and as transactions are made between generators and aggregators, there should not be unnecessary barriers to aggregators for making adjustments to their portfolio.
- We support requiring the prevailing wage for large systems.

Thank you for your attention,

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