

Ms. Howlett,

We would like to provide comments on the proposed regulations for the MA solar carve-out to the RPS. I will provide the comments in this email, please let me know if you need a mailed copy as well.

SRECTrade operates a marketplace that matches SREC buyers and sellers in the states that have solar carve-outs to their RPS'. We have already signed up customers in MA and plan to have an operating monthly SREC auction for MA SRECs soon. We are concerned about the meter reading requirements for solar facilities, as outlined at http://www.mass.gov/?pageID=eoeeterminal&L=5&L0=Home&L1=Energy,+Utilities+%26+Clean+Technologies&L2=Renewable+Energy&L3=Solar&L4=RPS+Solar+Carve-Out&sid=Eoeea&b=terminalcontent&f=doer_renewables_solar_metering-data-reporting&csid=Eoeea

The rules appears to require that meter readings be entered within 5 days after the end of each month, and if they are not the generation for that month is forfeit as a "penalty". We suggest that this requirement is unnecessary and overly restrictive. The state anticipates that many of the solar installations in MA will be residential, and as a result owned by homeowners. It is reasonable to assume that these homeowners routinely go on vacation or business trips, some of which will span the short 10 day window that meter readings are allowed. Reading a meter and entering the information is a rather technical endeavor and is therefore not something that a typical homeowner can delegate to the dog-sitter or a neighbor while they are away. As a result, we foresee many homeowners losing months of production because they are not able to comply with this standard.

We suggest that MA follow the lead of all the other state's with solar RPS carve-outs, and simply allow solar installations to enter their meter reading when they are able. The homeowner is incentivized to enter their reading on time, because if they don't they won't be credited any SRECs during that period. However, if they don't, they shouldn't lose their SRECs as a penalty. There is no reasonable basis for this penalty, since it is just as easy for those running the PTS to evaluate two months of production from a facility for reasonableness as one. We are more than happy to provide amplifying technical information to the Massachusetts Clean Energy Center (CEC) / Renewable Energy Trust on how to accomplish this if needed. Since SRECs are only credited quarterly, a limit of three months between meter readings may be a reasonable compromise.

Best Regards,

Kevin Quilliam
SRECTrade
P: (877) 466-4606 x100
F: (732) 453-0065
kevin.quilliam@srectrade.com
www.SRECTrade.com