



September 9, 2009

Susan Leavitt,
Susan.Leavitt@state.ma.us
Executive Assistant
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: Broadway Electrical Co., Inc. ("Broadway") Comments on Solar RPS Carve-Out Straw Proposal

Dear Ms. Leavitt:

Broadway appreciates the opportunity to submit comments regarding the Department of Energy Resources ("DOER") Solar RPS Straw Proposal. Broadway supports the DOER's efforts to implement the S-REC program as soon as possible to replace the Commonwealth Solar program. Broadway's comments address (i) program implementation, (ii) the minimum standard, and (iii) securitization.

Program Implementation

Broadway supports DOER's efforts to implement the S-REC program as quickly as possible, but even under perfect conditions the timing may prove problematic. In this respect, DOER should consider using all available funds extend the Commonwealth Solar program rebates as long as possible. These funds could include, to the extent available, American Recovery and Reinvestment Act ("ARRA") monies otherwise available to the Commonwealth.

In addition, DOER should consider a pilot program, e.g., over a 6 month time frame, to allow for an orderly transition from the Commonwealth Solar to the S-REC plan, as an opportunity to work out all of the start-up challenges associated with the transition. During this period, an external source for management should be employed to assist with designing and implementing the trading process (e.g., PJM served in this role in the New Jersey market).

Minimum Standard

The Minimum Standard for Cumulative Installations should be increased beyond the levels set forth in the Straw Proposal. As a starting point, DOER should consider as a baseline the development levels created by the Commonwealth Solar Program, plus standard industry growth nationwide (about 43% per annum). Accordingly, in 2010, DOER should start the RPS Solar Carve Out at approximately 30 MWs and increase it annually through 2020. Further, the program should be designed to develop more than 250 MWs; 250 MWs should not constitute a cap and, instead the program should be designed at the outset to promote robust solar development to create additional jobs, revenue and taxes.



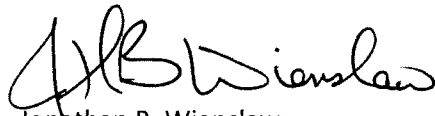
Securitization

Securitization of long-term S-RECs is required in order for financial institutions to provide funds for solar development projects. Broadway proposes that DOER establish clear structure so that lenders can calculate the value of S-RECs and be assured of value over a long term period.

Thank you for the opportunity to submit these comments. Please contact me if you have any questions or comments at 617-822-8831 or email at jwienslaw@broadelec.com

Respectfully submitted,

Broadway Electrical Co., Inc.



Jonathan B. Wienslaw

President

JBW/mh

