

June 29, 2016

TO: Massachusetts Department of Energy Resource
RE: New Solar Incentive Program Comments

Thank you for this opportunity to provide comment to the Massachusetts Department of Energy Resource (DOER) regarding the new solar incentive Program.

Beyond Green Construction attended the Listening Session hosted by DOER on Wednesday June 22, 2016. We hope these insights will be valuable in the development of a new, long-term and sustainable, solar incentive program pursuant to Ch. 75 of Act 2016.

Ideas for New Solar Incentive Program:

1. **Grandfather existing solar projects under current repayment structures to maintain the trust of customers who invested significant dollars into the industry.**
 - State-level solar policies are critical to the local solar industry
 - In 2016, when net metering caps were hit and SREC II was reaching its limits, the solar industry was essentially stalled statewide while waiting for the legislature to act.
 - SREC III, or the decided upon solar carve out incentive program, needs to have a built-in smooth transition that honors all policy commitments made to date.
2. **Maintain market-based, tradable SRECS incentives with regulated hard floor price.**
 - Keep the 10-year contract
 - The 10-year length of time is easy for customers to conceptualize and fits well with different solar financing options and home equity loans, which generally extend 10 years.
 - Consider implementing SRECIII with an “adjustable block” program that offers a set price for a targeted amount of solar capacity as long as program allows for real time monitoring of block availability.
 - When a solar sales contract is signed there is often a 4+ week waiting period before the application for interconnection is filed with the Utility. Any program implemented must ensure the incentive values offered at the time of the solar sales contract is signed is indeed the exact value in which the customer receives.
 - We prefer SREC system over the Feed in Tariffs (FITs). Although FITs are easier to explain, have a set price, and operate independent of the market, there is a higher political vulnerability. (E.g. Spain retroactively applied production caps, wiped out the economic benefits of the system.) Long-term contracts require governments down the road to honor the contracts. Additionally, utilities may try to impose extra charges to recoup costs (has been attempted in NJ, AZ, CA, VA)

3. **Ensure incentive recognizes and compensates for areas where solar generating customers are undercompensated due to lowered net metering credit value**
 - E.g. Eversource customers
4. **Remove system size limitations to allow customers to meet all on-site energy needs**
 - Currently only systems 10kW and under on a single-phase circuit and 25kW and under on a three-phase circuit are exempt from the private aggregate capacity limit, meaning systems larger than the 10kW and 25kW limits are subject to the utility's 7% net metering cap.
5. **Increase overall enrollment. Extend net metering to all municipal electric utilities**
6. **Include additional value for solar energy generated during peak loads (west facing)**
 - Solar systems that provide proportionally more on-peak generation should be compensated accordingly
7. **Carve out a way to keep environmental benefits with related projects**
 - When SRECS are sold, the ability for an individual or institution to claim the "green benefits" of their solar panels are lost as well.
 - Individuals, institutions and business owners who would like to promote the clean solar power energy they produce ought to have a way to be able to do so even after selling the SRECs.
8. **Storage solutions**
 - Consider solar solutions for demand based problems.
 - Design incentive structure with the potential to incentivize emerging storage solutions
9. **Land Use- Create incentives for development of solar projects on public lands / rights-of-way**
 - Recycling land for solar energy projects is consistent with sustainable development principles and solar redevelopment reduces the demand for fossil fuels and construction and installation work creates demand for local green-collar jobs
 - In neighborhoods with high percentages of vacant properties, solar installations can reduce blight and improve appearances. When a solar redevelopment project involves cleanup of a contaminated site, it has the dual benefit of decreasing public health risks and repairing damage to the natural environment. Furthermore, large-scale reuse projects provide an alternative to developing greenfield sites, and solar redevelopment at all scales is well positioned to take advantage of existing infrastructure and public services.
 - Ideas include solar on highway medians, parking lots, and using solar to generate the energy for public transportation.
 - State contracts for solar projects should give preference for local businesses and opportunities for small business to collaborate to accomplish the job
10. **Low – Income Fairness**
 - Reinstate retail net metering for low income solar projects
 - Currently low income and community share solar projects receive 40% less than residential customers for the solar electricity provided to the grid. We support an equitable solar incentive structure.