



June 30, 2016

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Re: Comments on designing a new solar program

Dear Mike,

I know you will be receiving a number of comments on designing a new solar program, so I'll keep my comments brief and to the point.

If humanity wishes to preserve a planetary climate that is livable, we need to collectively take bold action to dramatically reduce carbon emissions as quickly as possible! Massachusetts is in a leadership role and, as solar leaders, we have the responsibility to continuously redefine what is possible in terms of transitioning our state's economy to one powered by 100% renewable energy.

1. **% from Solar** The new solar program needs to have a clear goal of meeting a significant percentage of Massachusetts' electricity consumption with solar generation. On the path to 100% renewable energy, an ambitious solar goal will motivate and stimulate market creativity to speed up our transition to a clean energy economy.
2. **Equal Access for Everybody** Only about 1 in 5 Massachusetts properties is a good candidate for rooftop solar. The other 80% of citizens, including low-income residents and businesses, need access to solar energy. It is only fair. All ratepayers pay for solar and all ratepayers should have access to solar. Community Solar provides this necessary democratic access. Promulgate Community Solar regulations at full retail rate with equal access for all ratepayers in the state.

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3. **True Value of Solar** Multiple studies have shown unequivocally that solar energy provides value to the utility, to the grid, and to society at a price point higher than that currently compensated for. Solar reduces the cost of electricity to all ratepayers. As such, the new solar program needs to reflect this reality and encourage the installation of as much solar capacity as rapidly as possible.
4. **Energy Storage** Energy storage will be transformative to distributed generation, and will further increase the value of solar to society and the grid. We look forward to reviewing DOER's forthcoming report that we understand will address monetizing storage capabilities.
5. **Align Utility Companies with Societal Goals** Using the successful model of energy efficiency programs in Massachusetts, DOER should advocate to the DPU and the legislature, to align utility company motivations (profit) with societal goals (clean energy, climate change mitigation, stronger state economy) and existing legislation (Global Warming Solutions Act). Utilities should be compensated to encourage the development of distributed generation in Massachusetts. Only when utilities are brought onto the team fighting for the health of our planet, will we see dramatic progress and fully harness clean energy's engine of economic growth.
6. **Raise the RPS** DOER should be the policy voice to recommend to the legislature to raise the RPS to meet the significantly increasing capacity of solar and wind in Massachusetts.
7. **Comprehensive Energy Planning** In a presentation to a Senate Committee, lead by Sen. Marc Pacheco on Jun 21st, The Brattle Group spoke about the need for "comprehensive energy planning". As former lead residential consultant to the Energy Efficiency Advisory Council (EEAC), I know the vital importance of understanding the various moving parts of our state's energy system/economy, and using that understanding to craft the most intelligent public policy. EOEEA, through DOER, should engage in a comprehensive energy planning effort, including consideration of retiring fossil & nuclear generation, GWSA compliance obligations, compliance with Kane vs. DEP, job creation and keeping energy dollars in the state, financing options (including commercial and residential PACE) and significantly ramping up Massachusetts' clean energy economy.

Many thanks to you and DOER for the opportunity to submit my comments. I look forward to welcoming a bold visionary new solar program that dramatically ramps up installations in order to help meet our common need to preserve a livable climate.

Best regards,

John Livermore  
Executive Director  
Healthy Home Healthy Planet