

June 29, 2016

Ms. Kaitlin Kelly
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

The following comments are submitted on behalf of the Municipal Electric Association of Massachusetts, Inc. ("MEAM"), in response to the Department of Energy Resources' ("DOER") request for comments regarding the design of a new solar incentive program ("SREC III").

MEAM is composed of 40 publically owned and controlled Municipal Light Plants ("MLP's"), serving about 13% of the electric consumers in the Commonwealth. Publically owned and controlled means the MLP's represent the interests of their owner/consumers. This is the hallmark of public power.

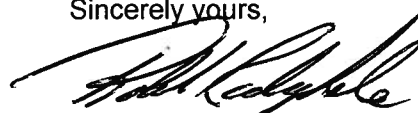
MEAM believes that the solar incentive programs which have been in place over the past few years have been enormously successful for customers of both MLP's and electric distribution companies. As such, MLP's voluntary participation in those programs will continue.

The current structure, allows municipal light plants and their customers who have installed solar generation to participate in the SREC market while not subjecting the MLP's to RPS requirements. This is the structure that best accomplishes the goal of reducing greenhouse gas emissions through the adoption of renewable generation technologies, while recognizing and allowing for MLP's rates and policies to be statutorily controlled by locally elected or appointed officials. Through this structure, MLP's have been at the forefront of green energy initiatives and collectively their power supply contains over 37 MW of solar owned or contracted power.

It is our understanding that proposals have been discussed regarding the participation of MLP's and their customers in the SREC III program. As it is premature to have received any written proposals from the DOER, it is difficult to address, at this time, any particular proposals. However, MEAM felt it critical that it make known to DOER its willingness to work towards a mutually beneficial result for the MLP's and the Commonwealth. As the DOER works through its process, given the great success enjoyed by the state with solar initiatives, MEAM would urge the DOER to consider the existing statutory framework which recognizes the local MLP's ratemaking and policy decisions. MEAM looks forward to discussing this framework as DOER pursues the development of its SREC III program.

Please do not hesitate to call with any questions you may have.

Sincerely yours,



Robert P. Rodophele
Ferriter Scobbo & Rodophele, PC