



Attention: Kaitlin Kelly
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020, Boston, MA 02114

Noble Americas Gas & Power Corp. ("Noble") appreciates the opportunity to submit comments regarding the next MA Solar Incentive Program and the level of commitment shown from the DOER in recent listening sessions and the releasing of public reports. Additionally, Noble is grateful for the amount of hard work that the DOER has put forth to ensure a smooth transition between programs while considering stakeholders' opinions.

Noble would like to focus its comments on the DOER's decision to choose between a Market-Based or Tariff-Based approach. Noble understands the mindset of creating a level playing field for all participants through tariffs, however this also would eliminate a competitive marketplace and in turn discourage development. Both the MA SREC I and II programs have been incredibly successful and well-participated, as evidenced by the nameplate capacity exceeding the initial 1600MW cap.

In terms of a Market-Based approach, Noble recommends a continuation of the current MA SREC II construct for MA SREC III with lower ACPs and auction floors to appease rate payers. The continuity and similarity between incentive programs would create much needed confidence in the market.

Thank you very much for allowing us to submit comments and we look forward to the decision by the DOER.