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Ms. Kaitlin Kelly
DOER
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Ms. Kelly,

My name is Kevin Kelly and I'm the Manager of the Groton Electric Light Department (GELD). It is my understanding that the DOER is seeking feedback regarding proposed redesigns of the SREC program, commonly known as SREC III. I appreciate DOER's outreach efforts to various stakeholders including municipal utilities seeking our ideas relating to proposed structural changes to the program. I am specifically responding to a meeting that was held on May 23, which was attended by a representative of the Massachusetts Municipal Wholesale Electric Company, (MMWEC) and other municipal utilities. GELD is a member of MMWEC and was given a briefing on the meeting and informed of DOER's desire to receive comments from municipal utilities.

Massachusetts energy policy is intensely focused on developing a low-carbon power supply to meet the goals of the Global Warming Solutions Act. As evidence of our commitment to these goals, GELD has a power supply that was 56% carbon-free in 2015, we completed a 2.2MW solar farm in town this month and have an interest in an additional wind project under construction. The other 19 member municipal utilities of MMWEC currently have a power supply that is approximately 46% carbon-free. As compared to the region as a whole, the MMWEC/municipal power supply is about 40 percent cleaner than generating resources serving New England.

Today, municipal utilities are true to our founding principles, respecting the tradition, value and responsibility that come with public ownership and control. At the same time, our approach to the challenges of today's electric industry and marketplace is dynamic and progressive. We are embracing greener and cleaner energy policies, emerging technologies and smart grid initiatives without mandates to do so. We recognize that our systems are an integral part of the electric utility industry and that our programs and services must adapt to broader changes in the industry, which often are driven by customer demand. As one of the 20 MMWEC member municipal utility service territories, our solar projects have a combined capacity of over 25MW.

It is my understanding that DOER is considering possible proposals for the SREC III program which include: a solar tariff, SREC III in which municipal light departments are exempt from Renewable Portfolio Standards (RPS) requirements, and SREC III in which municipal light departments are required to comply with the SREC III RPS.

GELD believes maintaining the current structure, which allows municipal utilities and our customers who have installed solar generation to participate in the SREC market while not subjecting municipal utilities to RPS requirements, is the structure that best accomplishes the overarching goal of reducing greenhouse gas emissions through the adoption of renewable energy generation technologies. This structure respects municipal utilities' statutory mandate that includes a not-for-profit business model and local control over decisions that affect the quality and cost of electric service, exercised by locally elected or appointed municipal utility officials. GELD believes that this structure provides the best platform to achieve the SREC's program goals.

I appreciate the opportunity to provide DOER with our comments regarding possible redesigns of the SREC program and look forward to the continuation of the program.

Sincerely,

A handwritten signature in black ink that reads 'Kevin P. Kelly'.

Kevin P. Kelly
Manager