



50 Franklin St., Suite 417
Boston, MA 02110

June 30, 2016

Michael Judge, Director of Renewable and Alternative Energy
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Comments on Next Solar Incentive Program

Dear Mr. Judge,

Independence Solar appreciates the opportunity to be able to submit comments on the design of the next solar incentive program for the Commonwealth. We would like to submit the following comments for consideration by DOER to as you undertake this very important task of developing the future of solar in our state:

1. Implement a long duration for this next program → **at least 5 years (2017-2021)**

SREC II program regulations were filed in April 2014 and then in January 2016 the DOER announced that the capacity for SREC II for projects > 25 kW was fully subscribed. **That is only 20 months.** This followed on top of a similar trajectory for SREC I. The continual stop and start of MA incentive programs has been a killer for small businesses that either can't hire new employees or need to reduce headcount as soon as these programs expire. The start/stop nature also drives up costs for all solar businesses, consumers, and ratepayers. DOER could deliver a more effective incentive program simply by implementing a longer minimum program duration so that solar businesses can ramp up and become more efficient rather than hurriedly chasing fleeting public policy.

2. No gap between SREC II and next program (or institute a bridge program)

Solar companies in MA are already reeling from the policy rollercoaster of the past several years. It is vital that there is not another full stop once SREC II is completed. If it is not possible to have the next solar incentive program in place by January 2017, please consider using your authority to extend the SREC II program in some capacity in order to provide a smooth transition to the next full solar program. This will serve to keep solar jobs in the Commonwealth and also lower costs as we transition to the new program as the industry won't have to start back up from a full stop again.

3. Either SRECs or a declining block structure would work if designed to be fair and not overly complex. More important is the speed to implementation after the expiration of SREC II.

While SREC programs are inherently more complex, the industry and solar consumers in MA are already well versed and acclimated to the SREC program, so a modification of SREC II for the next program would work well. Continuing SRECs may also be easier and faster to implement. Declining block programs can be more straightforward, but having to set up a completely new program from scratch could be both time consuming and costly. We would only be in favor of switching program structures if there was a bridge program in place to cover the period until the new program was fully up and running.

As always, Independence Solar would like to thank the Department for its consideration of our comments.

Sincerely,

James Schwartz
Vice President
Independence Solar, LLC