



June 30, 2016

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

Re: Design of a new solar incentive program

Dear Mr. Judge,

Vote Solar appreciates the opportunity to provide written comments in response to the request from the Department of Energy Resources (DOER) for recommendations from stakeholders to inform the design of a new solar incentive program in Massachusetts. Vote Solar supports the overarching goals of this process, to create a long-term, sustainable and cost-effective solar program in the Commonwealth. We will be brief in favor of highlighting other stakeholders' comments.

Vote Solar is a non-profit grassroots organization working to foster economic opportunity, promote energy independence and address climate change by making solar a mainstream energy resource across the United States. Since 2002, Vote Solar has engaged at the state, local and federal levels to remove regulatory barriers and implement the key policies needed to bring solar to scale. Vote Solar is not a trade group and does not have corporate members. Vote Solar is actively participating in regulatory proceedings with regard to solar in states across the U.S, including: Arizona, California, Colorado, Georgia, Iowa, Kansas, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, Utah, Vermont, among others.

INCENTIVE PROGRAM STRUCTURE

Vote Solar agrees with the principles and concerns relating to incentive structure highlighted in comments submitted by the Solar Energy Business Association of New England (SEBANE), Solar Energy Industries Association (SEIA) and Northeast Clean Energy Council (NECEC). Specifically, the need for policy stability, open access, a long term path and declining incentive level should guide the design of the new incentive program. For these reasons, Vote Solar believes that maintaining the Solar Renewable Energy Credit (SREC) mechanism in the new program is the right choice.

Solar is working for Massachusetts and the current policies – SREC-2 and net metering – are supporting an industry providing thousands of jobs, millions of



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dollars of energy savings, hundreds of million dollars of investment and countless environmental benefits. A Declining Block Incentive or Adjustable Block Incentive is also a strong incentive design with many strengths and other tariff or rate-designs, such as Time-of-Use or Smart Home rates, could have merit. If DOER or the Department of Public Utilities wish to consider these types of program, than a pilot would be the most prudent initial step. The programs that are working today to allow the growth of the solar industry should not be thrown out before we have data-driven evidence that a better policy exists.

TRANSITION TO THE NEW PROGRAM

Vote Solar also agrees with SEBANE, SEIA and NECEC that a smooth transition from the existing SREC-2 program to the new solar incentive program should be seamless. A gap between the solar programs would increase investor and customer uncertainty very shortly after recent solar policy debates have put the market on ice. This uncertainty at best raises the cost of financing and customer acquisition for projects and at worst can cost the state significant investment.

EXPANDING ACCESS TO SOLAR

Massachusetts has been a national leader in opening up access to solar to the many families and businesses that cannot put solar on their own roof and to low- and moderate-income communities. This leadership has been in large part due to the flexibility of solar net metering and the SREC-2 factors for community shared solar and low-income solar. Unfortunately, due to the recent changes to net metering, these market segments will slow down considerably. As highlighted in many other stakeholders' comments, it is critical that the new solar program continue to prioritize community shared and low-income solar, and in addition that it account for the new net metering paradigm going forward.

CONCLUSION

Once again, Vote Solar appreciates the hard work of DOER and all of the stakeholders. Vote Solar strongly encourages the DOER to hold as its highest priority the continued growth of solar in the Commonwealth and the corresponding growth of solar's many benefits.

Vote Solar appreciates the opportunity to submit comments on the design of the



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new solar program. Thank you for your time.

Sincerely,

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