



June 20, 2013

Department of Energy Resources  
100 Cambridge Street  
Suite 1020  
Boston, MA 02114  
Attention: Dwane Breger

Subject: Comments on Post 400MW solar incentive program

DOER staff,

Thank you for the opportunity to provide comments on the post-400MW solar incentive program policy. SunBug Solar is a Massachusetts owned and operated solar installer providing solar PV projects to homeowners, businesses, schools, houses of worship and other non-profit organizations. The success of 1200MW of additional solar PV capacity relies inextricably on the SREC II program.

As a locally owned, small business supporting residential and light commercial customers in the state, we are in support of DOER's goals for continued development in these market sectors.

Specifically, we are in favor of an adjustment factor applied to residential, small commercial, and non-profit projects in consideration of the fact that project cost and tax credit eligibility tip the economics scale in favor of large projects. **We emphasize the inclusion of adjustment factor for non-profit projects as it was not expressly included in the June 7<sup>th</sup> DOER presentation.**

In addition, we offer the following comments and recommendations for consideration:

1. Net metering "compliance obligations" and the state SREC incentive should be aligned in capacity and timeframe, in as much as possible, in order to create stable market growth.
2. We are in support of creating a firm price floor.
3. We are in support of a guarantee that SRECs will clear in the annual clearinghouse auction as described in House Bill 2915 or similar.
4. We are in support of a forward minting SREC option for customer-owned residential projects as a mechanism to assist in developing local financing solutions that allow Massachusetts residents to maintain ownership of their systems.

Sincerely,

Partners:  
Cheney Brand, CEO  
Ben Mayer, VP Marketing  
Lisa Raffin, VP Commercial Business