

Massachusetts DOER Team,

Thank you for pro-actively pursuing a post-400 MW solar policy. We appreciate your invitation to provide comments. Here are some comments we urge you to consider:

1. Please retain the administration of current SREC market (SREC 1) to protect current owners and financiers investments, and send a firm signal to future buyers and financiers that MA is a stable solar PV market. Administering this current program, for it's full 10 year stretch with a firm price support mechanism (auction), are key to avoid potential backlash and will enable confidence in the ensuing program.
2. Post 400 MW, three things need to be aligned.
 - a. Net Metering "compliance obligations" should mirror the state incentive in volume and time horizons. They are interrelated and co-dependent.
 - b. Next Market Size – If the next carve-out is only a 400 MW addition, at current pace, the market will be viable for only 2 or possibly 3 years. 400MW would be a patch, not a long term solution. We suggest the next "tranche" to be 2,000 MW, which will help meet RPS milestones with uninterrupted solar developments for the next 10-12 years.
 - c. SRECs transitioning to Class 1 RECs – DOER may consider a declining price "band" between ACP and floor (or **firm** support mechanism) for a 12 year period that enables financing and sunsets ratepayer obligations in correlation with the state economic and environmental benefits the solar program delivers. The Class 1 rates, 12 years from now, may be tenable using this type of schedule in correlation with net metering benefits.

Thank you for your consideration and efforts!

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