

The SREC program has been successful, in part, due to the distributed nature of the program which fosters consumer engagement. As a consultant serving large commercial/industrial end users and solar developers, I've found that customers are able to understand (generally) the solar carve out program and receive bids from multiple Engineer Procure, Construct (EPC) contractors. This model puts the customer first in that they are able to interview multiple EPCs and apply competitive cost pressures in the vendor selection process. This is only possible in a decentralized program and its important that policy makers recognize the value of customer driven adoption of solar. In a decentralized program, customers decide to "opt-in" and can then find a solar EPC and financing solution that meets their needs.

A central procurement mechanism leaves the customer out of the scoping and selection process and I feel would inhibit the growth of solar in MA.

Any post 400 MW solar policy should resemble the current Solar Carve-Out or Class I REC program with the following changes: a less generous solar incentive; outreach programs to increase involvement of community banks; a large capacity ceiling so provide several years of policy certainty. The issues with the current SREC program as I see them deal with the inflated financing and transaction costs associated with the PPA financing model. Third party monetization of tax attributes is very inefficient and customers would be better off using community banks to finance systems through more traditional financing methods.

Sincerely,

Jim Bride – President

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