



e-NRG Holdings LLC

April 8, 2013

Dwayne Breger, Ph.D.
Director
Renewable and Alternative Energy Division
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Dr. Breger:

The DOER hearing on March 22nd regarding the future of Massachusetts SRECs offered a range of options for the future of the Massachusetts SREC program. We appreciate the quality, creativity and level of effort in exploring all options for the continuation and growth of this program. We, too, support Governor Patrick and his Administration's commitment to a meaningful and healthy solar power industry in Massachusetts. If the next step creates confidence from and predictability for the range of stakeholders, especially financial institutions, Massachusetts will solidify its position of leadership on a national level.

In listening to the range of detailed options from DOER and comments from, and later discussions with, the stakeholders present, one factor stood out far above all others: the need for continuity. In order to maintain Massachusetts' leadership and growth toward a healthy industry, the transition from the current SREC program of 400MW to 401MW and beyond must be seamless. We are concerned that if there is a gap between the current program and a new program, the result will be confusion and unpredictability, and that will have long-term negative impacts on the Massachusetts solar industry. For example, if there is a six month gap between programs, it will take far longer than six months for larger scale investment in solar to recover.

The most viable option is the extension of rulemaking under current legislation. Whether the extension is short term, say another 400MW, or longer term, say 1,600MW, the long-term commitment to and the benefits of solar should be made clear to ratepayers, as they are the ultimate investors in solar power.

Also, to create continuity and ultimately drive down cost, there needs to be predictability and sustainability in the "floor" of SREC pricing. The current proposed Calter legislation would go a long way to accomplishing this goal.

We are aware that there are myriad ways to support these general principles. No matter what the final detailed structure of the revised SREC program is, without each of the



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stakeholder components—ratepayers, purchasers, financiers and developers—recognizing the benefits, solar will not be a meaningful part of our energy security and independence equation.

We are in full support of DOER's growth of the solar industry. Please let us know what we can do to help you achieve this goal.

Sincerely,

Ed. D.

Scott J. Nielsen
Principal