



April 8, 2013

VIA ELECTRONIC MAIL

Massachusetts Department of Energy Resources
doer.srec@state.ma.us

RE: Sierra Club Comments Regarding Massachusetts Post 400 MW Policy

To Whom It May Concern:

On behalf of the Sierra Club, I am submitting the following comments regarding the post-400 MW policy development process. Sierra Club fully supports the objective of the Department of Energy Resources (DOER) to provide economic support and create market conditions to expand solar photovoltaic (PV) installations in Massachusetts. A robust and thriving solar market will benefit Massachusetts ratepayers by creating jobs and decreasing dependence on harmful and climate-damaging fossil fuels.

DOER lays out two broad policy options to move the solar market forward in Massachusetts: Maintaining and expanding, with revisions, the existing RPS solar carve-out framework and establishing a new central procurement framework incorporating solicitation through long-term contracts or utilizing a feed-in tariff. Both options potentially have significant merit. However, in light of the legislative and regulatory hurdles identified by DOER that would need to be overcome in order to transition to a central procurement model, the Sierra Club recommends that DOER, as a first step, work within the existing solar carve-out framework to attempt to stabilize prices and to increase the size of the carve-out. Establishing a firmer auction floor price and reducing the alternative compliance payments should be effective in helping to stabilize the solar renewable energy credit (SREC) market. If modifications within the existing carve-out framework ultimately prove unworkable, DOER will still be in a position to take the more uncertain step of broadly overhauling the solar procurement structure. In addition, even under the present SREC carve-out framework, long-term for SRECs by the distribution utilities are possible, and the Sierra Club encourages DOER to require long-term contracts as a means of procuring SRECs even if DOER declines to shift to a centralized procurement model.

Thank you for your consideration.

Sincerely,

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