

June 26, 2019

Massachusetts Department of Energy Resources c/o John Wassam  
100 Cambridge St. Suite 1020  
Boston, MA 02114

Via Email to: DOER.SREC@state.ma.us

**Re: Comments - 225 CMR 14.00 RPS Class I Amended Draft Regulation**

Dear Mr. Wassam,

Thank you for all you do to support small PV systems in Massachusetts.

We own CS2-C22943-09154 a 7.1 KW Commonwealth Solar II PV system, installed in March of 2013 on our roof

Purchasing this system at an upfront cost of about \$41,000 was a major commitment for our family. Even with the subsidies and rebates provided by National Grid, the Commonwealth of Massachusetts, and the federal government, we are still paying on the loans required.

We urge you not to change the terms of SREC 1. For DOER to limit SREC I eligibility to each qualified generator's first 40 calendar quarters of SREC I participation is a breach of contract and a violation of trust. While we understand DOER's goal of achieving ratepayer savings, this proposal would be a policy reversal and would lead to negative ramifications for thousands of early adopter solar homeowners as well as numerous cities and towns, private businesses, and non-profit organizations willing to take a financial risk in a new and untested DOER program. If individuals and organizations cannot depend upon DOER to uphold their commitment, why would they risk investing in costly renewable energy projects?

The support provided by DOER has led to the development of a robust solar market in the Commonwealth. Policy stability is critical to ensure the Commonwealth's sustainable energy market continues to thrive. Massachusetts is a model for renewable energy policy throughout the United States.



For these reasons, we ask that DOER remain committed to the Commonwealth's established policy of allowing SREC I facilities to continue generating SRECs until the end of the program. Do not proceed with proposed amendments to 225 CMR 14.00 that would change that.

Thank you for the opportunity to comment and for your consideration.

Sincerely,

Robert E Barber 

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