



The Commonwealth of Massachusetts
House of Representatives
State House, Boston 02133-1054

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Mr. John Wassam
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Mr. Wassam:

Thank you for the opportunity to comment on the proposed changes to the RPS Class I Regulations, in particular on the proposed curtailment of the Solar Renewable Energy Credit I (SREC-I) program. I write to urge you to consider the detrimental financial impact of the proposed changes on the current program participants and to honor the original program terms for those participants who have not yet recouped the benefit of the program.

The department should honor the original SREC-1 program requirements for the existing residential program participants. The SREC-I's purpose was to encourage early adoption of solar. The original program participants should be able to rely on the terms and conditions that formed the foundation of their financial commitment.

The proposed changes will adversely impact individual residents currently enrolled in the SREC-1 program. The original participants made financial commitments based on the existing SREC-1 program requirements, which were published by the department. The original regulations stated clearly that after 40 quarters (or ten years), credits would no longer be eligible to be sold at the solar credit clearinghouse. However, the regulations said nothing about ending their eligibility to be sold on the market throughout the year, until the expiration of the program. Supporting materials, such as FAQ and webinar documents published by the department also stated clearly that projects would continue to generate SRECs until the program's final compliance year. The proposed changes to restrict all sale of credits after 40 quarters, rather than allowing them until the end of the program, represents a dramatic departure from the original program. Residents relied on the original program requirements to decide whether to invest in solar projects.

The proposed proposed changes will have a particularly detrimental financial impact on residents within the Third Plymouth district. The residents of the Towns of Hingham and Hull are serviced by municipal light plants, which limit solar net metering. Therefore residents of Hingham and Hull depend financially on the sale of the SRECs. Residents serviced by investor

owned utilities are able to recoup their investment within four or five years. However residents serviced by municipal light plants need nine and a half years to recoup their investment. By curtailing the program prematurely, the department is

The proposed changes will undermine the department's credibility and will compromise the ability to create similar incentive programs for other technologies in the future. The ability to incentivize the adoption of new green technologies is critical to Massachusetts' ability to achieve its Global Warming Solutions Act greenhouse gas emission reduction goals.

I urge you to reconsider this proposed regulatory change. Thank you for the extended opportunity to comment on this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Joan Meschino". The signature is written in a cursive, flowing style.

Joan Meschino
State Representative
3rd Plymouth District