



The Commonwealth of Massachusetts  
MASSACHUSETTS SENATE

**SENATOR PATRICK M. O'CONNOR**

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June 6, 2019

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

**RE: Proposed Regulatory Changes to SREC I Eligibility**

Dear Mr. Wassam,

I write to you today in strong opposition to the regulatory changes proposed by the Department of Energy Resources (DOER) to 225 C.M.R. 14.00, specifically the substantial modifications that will be made to the Solar Renewable Energy Credit (SREC I) program rules. Over the course of the last several weeks, I have had numerous constituents from the Plymouth and Norfolk District contact my office who will be seriously impacted by these proposed regulation changes.

Since 2010, the Green Communities Act and the Renewable Portfolio Standard (RPS) have been critically important in encouraging investment in clean energy in the Commonwealth. One of the driving factors for investment into solar energy was the implementation of the SREC I program and the promise the Commonwealth made that this program would run through 2023. The proposed regulation change to limit the eligibility period of this program and only permit solar projects to generate SREC's for the first 40 quarters of their eligibility is extremely unfair to my constituents.

The constituents I have spoken to, both residential and commercial solar array owners, invested in clean energy back in 2011 because of the innovative policies the Commonwealth and the DOER were implementing. These individuals took a financial risk by investing early in the program, when the cost of installing solar arrays was substantially higher than they are today. Many of these investors secured 10-year loans to pay for the cost of installing the solar panels, which will not be paid off until 2021. After paying off their loan, these investors anticipated seeing a return on their investment over the last two years of the SREC I program.

To offer an example, one of the commercial developers and small business owners in my district informed my office the reason he invested in solar energy was due to the SREC I program and that they never would have committed all of this time and money if they thought that Massachusetts was going to bait and switch them.

I believe that failing to honor the original regulations and the promise the Commonwealth made to these investors will undermine the Massachusetts solar energy market in a time where solar expansion is becoming more and more critical. I have no doubt that this regulatory change will impact the future development of solar projects and will hinder the state's ability to finance these new projects.

For these reasons, I strongly urge the DOER to not adopt the proposed regulation changes and to ensure that the SREC I program and their solar projects retain their eligibility until the end of the program in 2023, as intended.

As you review the proposed regulation changes, I hope you will consider the factors highlighted in this letter. Thank you for your time and attention to these matters. Please do not hesitate to contact me directly with any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. O'Connor", followed by a horizontal line.

**Patrick M. O'Connor**

State Senator

Plymouth and Norfolk District