



June 7, 2019

Judith Judson, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, 10th floor
Boston, MA 02116

Re: FirstLight Power Resources Comments: Renewable Portfolio Standard Class I and II Rulemaking on 225 CMR 14.00 and 15.00

Dear Commissioner Judson:

FirstLight Power Resources appreciates the opportunity to provide comments on the Massachusetts Department of Energy Resources' (DOER) proposed updates to the regulations for the Renewable Portfolio Standard (RPS) amending portions of 225 CMR 14--Renewable Energy Portfolio Standard – Class I ("RPS Class I") and 225 CMR 15--Renewable Energy Portfolio Standard – Class II ("RPS Class II").

Company Overview

FirstLight Power Resources (FirstLight) is a hydropower, energy storage, and solar generation company with assets based in Connecticut and Massachusetts. Our hydropower facilities in New England produce over 690,000 MWh of emissions-free generation, reducing the region's carbon footprint by more than 780,000 tons annually. In addition to our conventional and run-of-river hydro facilities, we also own and operate a 2 MW solar facility in Northfield, MA and the Northfield Mountain and Rocky River pumped hydro storage stations, which are respectively the largest and third largest energy storage facilities in New England. Because of its ability to store regional electricity generation from times when cleaner resources are running, existing pumped hydro storage is one of the greenest options for integrating and storing energy from intermittent resources such as wind and solar. Our facilities represent over a billion dollars of private investment in the region, employ 125 people, and pay our host communities in Massachusetts more than \$15 million in local property taxes.

FirstLight respectfully requests reconsideration of your proposal related to RPS Class I Solar Carve-out ("SREC I") qualified units.

Impacts on the state's ability to meet its carbon reduction goals:

As the owner of an SREC I-qualified project with a nameplate capacity of 2 MW in Northfield, Massachusetts, we are particularly concerned with the proposal to limit SREC I eligibility for existing SREC I solar projects. If enacted, these changes will harm many SREC I solar system owners and erode future investor confidence in Massachusetts incentive programs for clean energy, undermining the

efficacy of the state's future incentive programs. That uncertainty will increase costs across the market as a whole and will slow the state's progress toward meeting its carbon reduction goals.

Impacts on host municipalities:

Additionally, because solar systems are often valued on a discounted cash flow basis for the purposes of local property taxation, the proposed changes may also diminish the assessed property value of the system, having an impact on host municipalities that have supported construction of these facilities, and affecting their willingness to permit future such facilities.

For these reasons, we ask that DOER not proceed with its proposed amendments to 225 CMR 14.00.

Thank you for the opportunity to submit feedback and for the Department's thoughtful consideration of these comments.

Len Greene
Director, Government & Regulatory Affairs
FirstLight Power Resources
Len.Greene@firstlightpower.com