

Good afternoon,

My name is Steve Kaufman. I am Managing Director of Clean Asset Partners Corporation, a Massachusetts company that provides SREC and REC management for renewable energy system owners. Thank you, ~~Commissioner Judson~~, for the opportunity to testify.

*Director Judge*

I respectfully ask DOER to reconsider the proposed change to the RPS Class I regulation that would limit SREC I creation to the first 40 calendar quarters of each qualified project's eligibility. That would reverse DOER's previously stated intentions and its interpretation of the program rules to date.

While some stakeholders mistakenly thought the 40 quarter Opt-In Terms for the SREC I Clearinghouse Auctions also applied to the length of time projects could create SREC I's, DOER has always been clear. The Opt-In Terms apply to the Clearinghouse Auctions. All SREC I projects would be eligible to create SRECs until the program ends, but can only use the Clearinghouse Auctions during their 40 quarter Opt-In term. In addition to the regulations themselves, DOER provided written documentation making this explicit.

The proposed change would cut short SREC I creation for each of the nearly 12,000 qualified projects, terminating the program four years early for the earliest participants and by at least 1 quarter, even for the last projects to begin participating. Many of those who would be impacted were early adopters. Over 10,000 of the qualified systems are residential, I think about half or more of those are owned by the homeowner; there are also many systems owned by cities and towns, non-profit organizations, and private businesses, large and small. This would conflict with DOER's assurance that projects could create SREC I's through the program's final compliance year, changing rules that solar investors relied on since the program's inception, which have continued to be relied on when projects changed owners, and the successor owners, or their representatives, checked to confirm that the same rules and interpretation were still in place.

I urge DOER to reconsider, stick with the current rules, and not make this proposed change.

Again, I appreciate the opportunity to testify.

Thank you.