



June 7, 2019

Massachusetts Department of Energy Resources  
c/o Commissioner Judith Judson  
100 Cambridge St. Suite 1020  
Boston, MA 02114  
DOER.RPS@mass.gov

Submitted electronically

Re: 225 CMR 14.00: Renewable Energy Portfolio Standard – Class I (“RPS Class I”) Amended Draft Regulation

Dear Commissioner Judson,

Upon review of the Massachusetts Department of Energy Resources’ (DOER) proposed amendments to 225 CMR 14.00, Pioneer Valley Photovoltaics Cooperative, Inc. (d.b.a. PV Squared Solar) respectfully requests reconsideration of your proposal related to RPS Class I Solar Carve-out (“SREC I”) Renewable Generation Units.

PV Squared Solar designs, installs, and maintains photovoltaic energy systems, principally in western Massachusetts. We’ve been in business as a worker-owned cooperative since 2002. As the installer of approximately 290 SREC-I projects comprising 2,700 kW of solar in Massachusetts, we are particularly concerned with the following addition that was included in DOER’s amended draft regulations:

*14.06 Qualification Process for RPS Class I, Solar Carve-out Renewable Generation Units and Solar Carve-out II Renewable Generation Units*

*(3) Issuance or Non-issuance of a Statement of Qualification.*

*(f) Starting in the calendar quarter after the end of a Solar Carve-out Renewable Generation Unit’s Opt-in Term, it shall no longer be eligible to generate Solar Carve-out Renewable Generation Attributes, but will remain qualified to generate RPS Class I Renewable Generation Attributes.*

We appreciate your overarching goal of achieving ratepayer savings. But this proposal would have a negative and unexpected result for small businesses, homeowners and municipalities. It will have a chilling effect in the long-term on future investment and financing of projects in the Commonwealth.

Since its inception, SREC I customers were assured by the Commonwealth that their facilities would be eligible for SRECs until the program concludes. These assurances from DOER and Administration officials guided decisions that led to the investment in, and development of, a robust solar market in the Commonwealth. Policy stability is necessary to ensure this market continues to thrive.

While we agree that several amendments to the regulations can be characterized as clarifications, this policy reversal will show that the market has an uncertain future and subsequently affect other segments of the Commonwealth's clean energy efforts, such as energy storage. That uncertainty will increase costs across the market as a whole and run counter to the Administration's goal of realizing savings for ratepayers.

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

Thank you for your consideration of these comments. Please do not hesitate to reach out if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "William Stillinger". The signature is fluid and cursive, with a large, stylized "W" and "S".

William Stillinger, PV Squared Solar  
Co-owner and Manager, External Affairs  
860.839.1350

cc: Michael Judge

Kaitlin Kelly