Massachusetts Solar Owners Association
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October 28, 2016

Dept. Of Energy Resources
(DOER)
Boston, MA 02133

RE: Next Generation Solar Incentive Straw Proposal

Dear Michael Judge,

On September 23rd the DOER presented for the first time a proposal to replace the current solar incentive program, moving away from SRECs and Net Metering, and substitute them with a fixed price "tariff" system tied to a declining block schedule. Since the inception of MASOA we have advocated for a "Feed-In Tariff" similar to that used in Europe, but most importantly set at a tariff rate based on the "Value of Solar" (VOS) PV determined by an impartial study not unlike the those done by Acadia. Unfortunately it was not revealed what the tariff rate will be, or how it will be determined, other than to say past incentives are "higher" than necessary so as to suggest we could end up with too much renewable energy in the future?

Reality check – since 1980 to date we currently have less than 8% of our electricity produced by solar, even with currently too-high incentives. If our goal is to get to 20% solar by 2020, how will we do that in four years with less and declining incentives? Answer, we won't – and we don't have the luxury of destroying our growing solar PV industry, abandon all hope of replacing fossil and nuclear energy with renewable energy (gas is not a renewable or even an interim solution), our environment according to science, is reaching critical climate change that can't be ignored or sustained.

In 2014 the MA Solar Task Force concluded that a VOS study was the next step in design of a new solar incentive program. Why has this not been done? We recommend that SREC2 be continued and Net Metering be uncapped until said study is completed. We disagree that incentives are too high … if they were, every available roof would have solar panels instead of only 3% today.

Finally, if there is a lesson to be learned, it is this … unstable and inconsistent rules and incentives, plus unnecessary regulation will damage any growing industry – including solar. To grow solar 12% in the next four years we must set very simple and easy to understand incentives, and it is critical those incentives be "bankable" (stable long term investments). Since 2003 our state has failed to do this with solar programs run from MTC and all others. Now is the time for a "Feed-In" Tariff based solely on VOS impartial study that is stable for a minimum of five years, and protects the investor for the twenty-year life of their solar PV investment.

Sincerely, and thank you for your consideration in our participation,

Christopher Smith, *MASOA President*