



October 21, 2016

Secretary Judith Judson
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
DOER.SREC@state.ma.us

Dear Secretary Judson:

Brightergy offers comprehensive energy services for its clients. We specialize in distributed generation PV solar generation systems. Additionally, we assist our clients with energy efficiency and advanced monitoring solutions for their energy consumption and generation needs. Brightergy's office in Charlestown serves the entire Commonwealth, where we employ a full-time staff of sales, operations and client service professionals. Brightergy focuses on clients in the commercial and industrial space, who are seeking ways to pair long-term capital investments with environmental responsibility.

The SREC program has been an invaluable piece of the financial puzzle making solar projects attainable for customers in Massachusetts. The Commonwealth, the DOER, and the DPU should be congratulated on the successful rollout of SREC I and II, and the efforts thus far in promoting SREC III. SREC allows electricity consumers to complete sometimes complicated financing of solar projects and puts them within reach of independent operators of small and medium-sized businesses.

In addition to the specific program points below, it is important to note that the most important factor for customers and installers is certainty in the program. The sooner stakeholders have certainty regarding specific program points, the sooner the Commonwealth will see the economic development benefits of the statute. Until customers have certainty in the program's specific offerings, they will not invest in solar installations, and without that customer certainty, installers will not invest in the labor and materials necessary to construct those installations.

The 10-15 year tariff program will help bring certainty to customers who are looking to invest in solar. As the SREC III program details are developed, customers will need to gain more clarity into the adders to see how they will affect the design and implementation of their project.



Specifically, how will Energy Storage be defined as it relates to the size of the system and what are the distinctions between the policy-based adder categories.

Sincerely,

Andrew Zellers

General Counsel/VP for Regulatory Affairs