

306 Winthrop Street, Suite 119
Taunton, Massachusetts 02780

NorthEast Clean Energy, Corp.
Ron Medeiros, President

September 30, 2016

Department of Energy Resources
100 Cambridge St. Suite 1020
Boston, MA 02114

Dear Department of Energy Resources,

I would like to start by thanking the DOER for holding the Next Generation Incentive Straw Proposal meeting on Friday September 23 at the Morris Auditorium. It was a very informative meeting. NECEC completely agrees that the elimination of the SREC program will create more stability in the market. That said, there are certain areas that we believe require adjustments which we would like to address.

1.) From an investor/funding standpoint, a 20-year program is critical. Lenders and investors alike require a longer window of certainty than a 10-15 year program allows. Currently NECEC is negotiating 25-year contracts with up to three 5-year extensions. The same holds true for the value of the lease, be it a ground lease, rooftop or canopy. The inherent value in monetizing this asset will be diminished by the shortened time span. 25-years would be preferred, but 20-years could work on the low side. That said, NECEC does not see where anyone gets hurt from a 25-year program.

2.) Currently, as was expressed by other speakers, the ground mount solar industry (with few exceptions) is OUT OF BUSINESS in Massachusetts. The industry needs a program that it can work with and it needs it NOW. NECEC is a Massachusetts based company currently permitting several ground mount solar projects. NECEC has made a substantial investment in engineering, utility fees and other non-recoverable expenses in multiple solar projects that will be lost without an interim program. NECEC has many Massachusetts based subcontractors who call daily regarding the status of various projects. Likewise, we also receive numerous telephone calls from land owners pleading with us to move projects forward. PLEASE do what you can to allow us to get back to work and help the land owners that are all waiting on the sidelines. We look to you at this time for leadership.

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3). While the preceding items are extremely important, there are none more critical to the solar industry in Massachusetts than those surrounding the Solar Siting Criteria. The first item I would like to discuss is found on slide 10 which reads that “Ground mounted solar projects will be prohibited from qualifying if sited in any of the following areas:”. It goes on to list “Land designated as “forest land” under Chapter 61. Chapter 61 is a voluntary program that the land owner can opt out of or can expire with the passage of time. In fact, all solar projects on Chapter 61 land require the removal of the parcel(s) from the program. PILOT agreements are negotiated in its place. This has been a benefit to many communities by allowing for a broader tax base and increased revenue while simultaneously removing land from potential residential and commercial development.

Another area of critical concern is prohibiting ground mount solar projects from Prime Farmland Soils and Prime Forest Land. While on the surface this may sound like a good idea, it will hurt family farmers, land owners and municipalities. The proposed regulations do nothing from preventing the development of these lands for residential and commercial uses. Many farmers and land owners have been able to derive revenue from their properties thanks to payments they have received from solar projects. Without the income from solar, farmers and land owners will have one less option for their land and will lose the long term stability a lease can afford. The farmer and land owner may be left with no other alternative than to sell their land for other development purposes that will undoubtedly have a higher degree of impact on the community and the environment. Solar development creates a minimal amount of impervious surface compared to any other form of development. With the increased burden development places on municipal services like Police, Fire and Schools, the land owner and the municipalities all lose. Also, when the land in question is eventually inherited by other family members, in most cases, the first move made by the heirs is to “sell the farm”. Long term leases will protect the open space over an extended period of time and in many cases provide a source of income for future generations. This prohibition will take us back to the days when family farms were disappearing as residential and commercial development took its place. As a developer with over 25-years of experience in buying and selling real estate, NECEC will need to look at these very same properties that we have spent large sums of time and monies on engineering for solar projects and reconsider them for residential or commercial development purposes. I ask that you take a very hard look at the proposed Chapter 61, Prime Forest land and Prime Farm land Soils land restrictions. In short SAVE OUR FARMS – SUPPORT SOLAR.

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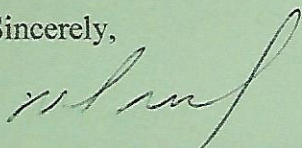
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NorthEast Clean Energy believes that members from the solar industry should have been given the opportunity to comment and advise the DOER prior to the unveiling of the straw proposal. NECEC also feels that it will be impossible for the DOER and the solar industry to “maintain robust growth across installation sectors” as presented as a DOER objective, given the current proposed prohibitions in the straw proposal.

In closing, I would like to say that NECEC supports the tariff concept with time frame revisions, requests the institution of an interim program as soon as possible and strongly opposes the prohibited areas in the Siting Criteria for Chapter 61, Prime Farmland Soils and Prime Forest Land.

- * SAVE OR JOBS
- * HELP OUR FARMERS AND LAND OWNERS
- * PROTECT OUR LAND FROM RESIDENTIAL DEVELOPMENT
- * HELP OUR CITIES AND TOWNS
- * SUPPORT SOLAR

Sincerely,



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