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October 27, 2016

Mr. Michael Judge  
Director  
Renewable and Alternative Energy Division  
Massachusetts Department of Energy Resources

Dear Mr. Judge,

Thank you for the MA DOER's work on the post-SREC-II incentive program and for establishing a means to receive public feedback on the "straw proposal".

621 Energy has been serving the Massachusetts commercial solar market since 2011 as a commercial developer and solar contractor, generally focused on projects less than 1 MW. I have the following suggestions and concerns regarding the "straw proposal":

1. The solar industry needs market continuity during the transition to a new incentive for systems greater than 25 kW, otherwise the commercial market will be dead until the new program is announced. The most straightforward solution would be to continue with the SREC-II reduced factors until a new program is instituted.
2. The proposed program size of 1600 MW is too small. A program that lasts at least 5 years should be developed.
3. If going with a block system with decreasing incentives, the change in value should occur on a calendar basis once or twice per year, not based on block MW size. The incentive should be locked in at the interconnection date. The change should not be based on block size or some kind of reservation system that is more complicated and causes peaks and valleys as people rush to reserve higher incentives.
4. The incentives should generally be more favorable for systems that are behind the meter and use existing low impact sites such as roofs, closed landfills and parking lots (carports).
5. I have concerns about "large virtual net meter" systems being a disproportionately large beneficiary of these incentives as compared to other categories. The sample tariff examples from the presentation are concerning. A Small System is shown to receive about 10 cents per kWh incentive for 10 years, a Medium System (behind the meter) receives about 3 cents per kWh for 15 years, and a Large System (Qualifying Facility) receives about 12 cents per kWh for 15 years. It would be valuable for MA DOER to project in total \$ in various categories where the incentive \$ will flow and see if that correlates to the program goals.

Thank you for your consideration.

Sincerely,

Robert Clarke  
President  
621 Energy, LLC