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Commissioner Judith Judson  
Director Michael Judge  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
(via email)

October 28, 2016

Dear Commissioner Judson and Director Judge,

Thank you for this opportunity to comment on the straw proposal. We are advocating on behalf of our customers, all ratepayers and all residents of the Commonwealth.

**First and Foremost there is the Need to meet Global Warming Solutions Act goals**

Solar PV generation is a major player for meeting the GWSA goals of reducing greenhouse gas emissions 40% by 2030.

Massachusetts needs to ramp up the development of PV from 350MW/yr to 800MW or more. This will be a major economic boost for the state in well paying jobs, greater reliability and resiliency in the grid, and less dependence on fossil fuels.

Massachusetts needs 6 GW of solar by 2020, not 3200 MW! A goal of 20 GW by 2030 for just the beginning of the hard push to 100% renewables by 2050.

Massachusetts needs an incentive program which will allow for the continued expansion of solar PV into the harder, more costly siting situations as the easy low hanging fruit is going fast. There needs to be flexibility in the tariff and adders for future scenerios. It is essential that DOER commits to revisiting blocks changes periodically (for example, once a year) to evaluate market signals. The decreasing rate set in advance may not be adequate to meet our solar build-out goals. If you take the long-range view, the easiest spots to install solar, such as landfills, brownfields, parking lots, and south-facing roofs, will get used up first, and installing solar on the remaining places will be harder and more expensive. If instead of decreasing the adder fees over time, you increase them, more difficult/ expensive projects will be attempted in the last block, rather than not being worth it after all of the higher incentives are used up by easier projects in the first blocks.

Massachusetts needs a provision for TOU rates and how to factor that possibility. Take into account the potential for MMRC or other proposed fixed charges, particularly for residential systems.

Thank you for your time and consideration,

Claire Chang  
John Ward  
Solar Store of Greenfield