



## **ALL CORRECT SOLAR**

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Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
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Dear Sir or Madam:

Thank you for your attention to the Massachusetts solar economy, and protecting its jobs.

I'd like to offer my perspective on the proposed Next Generation Solar Incentives (SREC 3). Over the past 8 years I've spend most of my time in two roles 1) Solar Project Developer and 2) Manufacturer of Solar Products (Sharp & SolarWorld). I offer the following comments from these perspectives.

My company's project development strategy is centered around two models: Municipal Portfolios & Community Shared Solar (CSS). As I'm sure you know, it's more difficult to develop projects when municipalities are involved. This is due to a number of reasons including: the inability to utilize tax credits or depreciation, the cost of RFP writing, the cost/risk of town meetings, and the cost of 'payments in lieu of taxes' (PILOT). While municipal projects face these strong head-winds, they benefit all taxpayers. I am confused as to why a municipal project adder wasn't included in the incentive structure. Please consider creating a municipal adder to offset the higher cost of these mutually beneficial projects.

Distributed smaller systems (10kW single-phase & 25kW 3-phase) have a broader benefit to the taxpayers, the community and the grid. While (20) 10kW systems cost more and require more paperwork than one 200kW system, these smaller systems still accomplish the goals of the proposed

adders. Removing the adders for these smaller systems would be counterproductive to the spirit of this program.

Additionally, expanding the duration of payments to 15 years for < 25kW installs would greatly increase the attractiveness of their financial models – encouraging more growth and spreading benefits to more taxpayers.

From the view point of US manufacturing, please consider an adder for new technologies (beyond energy storage), as well as adders for US and Massachusetts content. I appreciate your team's encouragement of the developing energy storage market – but I wonder why your team stopped there. There are many other evolving technologies that could greatly benefit this program, but need an adder to encourage their adoption. For example, building integrated PV (BiPV), such as solar-shingles, have a huge potential. Encouraging BiPV on all new construction and re-roofs would greatly accelerate this program's success, and would be a model for other states. Other new technologies to consider are: bifacial modules, AC modules / integrated modules, and smart grid integration.

Finally, to the extent allowed by the World Trade Organization, please consider creating adders for Massachusetts and US content. The cost-down pressure from foreign manufacturing is drowning US solar manufacturing. A US content adder would ensure quality manufacturing and quality jobs. Likewise, a Made in Massachusetts adder would encourage businesses to move to Massachusetts, expanding the Commonwealth's tax base and creating more well-paying, green jobs.

Thanks again for keeping your eye on this ever-evolving solar market, and your commitment to adapting.

Please do not hesitate to reach out if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Beryl Weinshenker', written in a cursive style.

Beryl Weinshenker  
CEO - All Correct Solar  
Contract Analysis - Greentech Media