



**HOLDEN MUNICIPAL LIGHT DEPARTMENT**  
ONE HOLDEN STREET  
HOLDEN, MASSACHUSETTS 01520  
(508) 210-5400

October 24, 2016

Ms. Katlin Kelly  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

RE: DOER Development of the Next Solar Incentive

Dear Ms. Kelly:

On behalf of the Town of Holden, the Holden Municipal Light Department submits the attached comments.

Holden is proud of its record and commitment to provide power to its customers from long term, diverse, reasonably priced and carbon neutral sources and to encourage its customers to use energy efficiently and wisely. To supplement these efforts, it has participated in the Renewable Energy Trust whose purpose is to advance the development of renewable resources in the state.

Holden will continue its strong record of taking actions to support reductions in the emission of greenhouse gases and mitigate climate change, and is committed to increase its involvement and to do its part.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A blue ink signature of James S. Robinson, written in a cursive style.

James S. Robinson  
General Manager

Attachment

cc: Jacquelyn Kelly – Holden Town Manager



## Holden Municipal Light Department

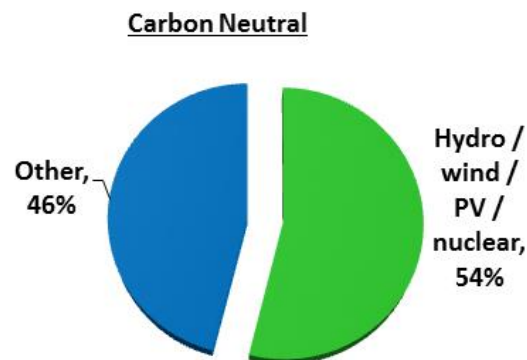
### DOER Development of the Next Solar Incentive

#### Holden Is Doing Its Part

There is a view among certain circles that the Massachusetts municipal light plants (MLPs) aren't doing their part to contribute to the state-wide effort to develop renewable generation resources and take other actions to reduce the emission of greenhouse gases and mitigate climate change. In the case of the Town of Holden and the Holden Municipal Light Department (HMLD), this view is incorrect.

Holden is very proud of the fact that over 50% of the electricity used by customers is carbon neutral. This has been the case over the past several decades.

#### Sources of Holden's Energy - 2017



HMLD, and its customers, have been very active in making a positive contribution to mitigating climate change.

- Holden, along with many other MLPs, participate in the Seabrook and Millstone 3 nuclear projects, which are significant carbon neutral generators, as they emit no greenhouse gases. After all the investor owned utilities divested of their Seabrook and Millstone 3 nuclear shares fifteen years ago, Holden and other MLPs stayed in the projects, which over time represented very expensive sources of power. Now, over 25 years after the nuclear units began operating and the debt associated with building the units is being retired, they provide a very reasonably priced and highly reliable source of around the clock power. Currently, 40% of the power used by our customers comes from these two carbon neutral nuclear units.



## **Holden Municipal Light Department**

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#### **Holden Is Doing Its Part**

- Wind – Holden is one of 14 MLPs which are members of the Berkshire Wind project located on Brody Mountain in western Massachusetts. This 15 MW project went into service in 2011 and at the time was the second largest wind generation facility in Massachusetts. Next year, Holden and other MLPs will start receiving the output from the Hancock Wind project in eastern Maine. This 51 MW project is one of several wind projects in Maine that represent significant new renewable generation resources in the region.
- Hydro – Holden customers receive power from three separate hydroelectric projects, both regionally and locally. Over the past decades, Holden and other MLPs have received power from facilities in New York operated by the New York Power Authority. Recently Holden entered into a power purchase agreement to buy the output from four small hydroelectric generators in central Massachusetts, thereby supporting small local facilities. Holden and other MLPs also receive power from several medium sized hydroelectric facilities in New Hampshire.
- Solar – Holden has a very robust net metering program. It not only provides full retail rate credit for all energy delivered to HMLD from the customer's system, it "banks" any excess energy in one month for future use by the customer, acting in a way like an energy storage facility. This gives solar customers full value for their systems. Presently, there are 65 PV/net-metering systems operating or under construction in Holden with an installed capacity of about 730 KW producing about 950,000 KWH per year. Included in those numbers are 4 systems installed on Town buildings and 3 systems at commercial locations and facilities of other municipalities located in Holden. The vast majority of the systems are on residential properties. This robust net-metering program has made Holden a popular platform for customers to participate in hosting renewable energy facilities, thereby contributing to the state's efforts to curb greenhouse gases.
- In 2009, Holden joined the Renewable Energy Trust, which is administered by the Massachusetts Clean Energy Center (CEC). Holden is one of 5 MLPs to do so. Not only has this participation provided incentives to customers installing PV systems in town, it has supported the broader initiatives of the CEC across the state.

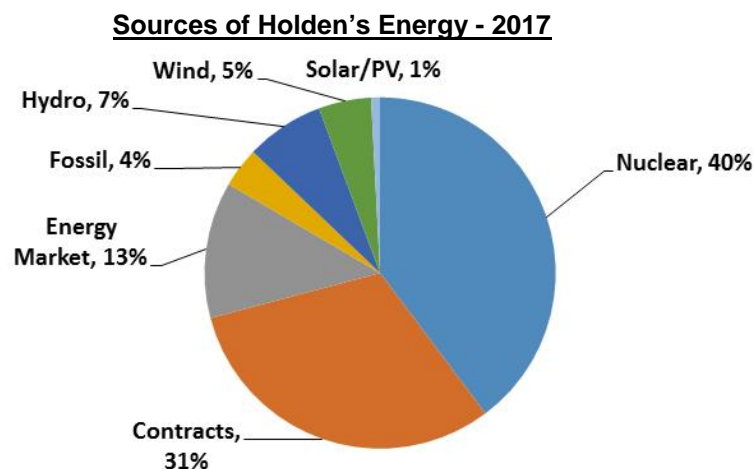
## Holden Municipal Light Department

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#### Holden Is Doing Its Part

- Holden has robust energy conservation and energy efficiency programs available to all customers. Residential customers are provided free energy audits, Energy Star appliance rebates and home energy improvement rebates. Non-residential customers have access to custom retrofit rebates and prescriptive lighting rebates. These programs have been expanded in recent years and the plan is to continue to do so. These programs have been funded solely from customer revenues, as no RGGI<sup>1</sup> funds are available to supplement these programs.

HMLD's philosophy on procuring power on a long term basis for its customers has been, and will continue to be, based upon fuel source diversity, price, supply stability and sustainability. As we develop our forecast for 2017, the combined output from our nuclear, wind and hydro sources are projected to provide 52% of our energy at a composite cost of 5.5 cents per KWH. An additional 1% is expected from customer's existing PV systems.



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<sup>1</sup> RGGI – Regional Greenhouse Gas Initiative.



## Holden Municipal Light Department

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#### Holden Is Doing Its Part

Holden is proud of its record and commitment to provide power to its customers from long term, diverse, reasonably priced and carbon neutral sources and to encourage its customers to use energy efficiently and wisely.

Looking to the future, Holden has the desire, and acknowledges the need, to participate in additional initiatives for further reduce energy consumption and greenhouse gas emissions. Holden will continue to participate in cost effective renewable energy power supply opportunities as they become available. In addition, Holden is considering the following initiatives:

1. Channel all proceeds received from selling Renewable Energy Certificates (RECs) from existing power supply projects toward enhanced conservation and energy efficiency programs for all customers.
2. Channel all proceeds received for Holden's fair share of RGGI funds toward some or all of the following:
  - a. Enhanced conservation and energy efficiency programs for all customers;
  - b. Rebates to customers installing renewable energy facilities on their premises in Holden;
  - c. Installation of renewable energy facilities by Holden or HMLD.  
(Installation of a production scale solar facility on the Town's capped landfill is under consideration.)

In summary, Holden is proud of its record and commitment to provide power to its customers from long term, diverse, reasonably priced and carbon neutral sources and to encourage its customers to use energy efficiently and wisely. To supplement these efforts, it has participated in the Renewable Energy Trust whose purpose is to advance the development of renewable resources in the state.

***Holden will continue its strong record of taking actions to support reductions in the emission of greenhouse gases and mitigate climate change, and is committed to increase its involvement and to do its part.***