



October 28, 2016

Michael Judge, Director of Renewable and Alternative Energy
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Comments on Solar Straw Proposal

Dear Mr. Judge,

Independence Solar appreciates the opportunity to be able to submit comments on the Department's Straw Proposal for the next solar incentive program for the Commonwealth. We would like to submit the following comments for consideration by Department to as you undertake this very important task of developing the future of solar in our state:

1. Declining block structure with fixed tariff payments is a good approach for the next incentive program.
2. We are concerned that 1,600 MW is too small for the program's overall capacity and we will be back in the same disruptive and costly cycle we experienced in SREC I & II with a changing incentive program every few years. An initial 3,200 MW program capacity with appropriate step down's in cost for each block would give the solar industry the certainty to continue to add jobs and drive down costs for customers and ratepayers.
3. The process of "netting" the energy value out of the tariff payment is potentially very complex for systems with actual customer load behind the meter, so the design of the program must be able to seamlessly accommodate different customer rate classes and billing structures to provide a clear and predictable value stream for those behind the meter customers.
4. Given that net metering is capped, or likely will be capped in the near future, for most private commercial customers (> 25 kW) across the Commonwealth it is imperative that the proposed Adder for the "Non-Net Metered Facilities" at the proposed rate of \$0.05/kWh is included as part of the final program design. Otherwise, in the absence of the Legislature expanding net metering capacity, the private commercial market will significantly contract or disappear as the economics of this program would not support these types of projects, which should be priority of the Department due to the beneficial land use and grid-support value delivered by commercial systems installed behind customers' load meters.
5. Eliminate any potential gap between SREC II and this next program. Solar companies in MA are already reeling from the policy rollercoaster of the pass several years. It is vital that there is not another full stop once SREC II is completed as currently planned. Please consider using the Department's authority to extend the SREC II program in some capacity in order to provide a smooth transition to whenever this new program is in place. This will serve to keep solar jobs in the Commonwealth and also lower costs as the industry won't have to start back up from a full stop again.

As always, Independence Solar would like to thank the Department for its consideration of our comments.

Sincerely,

James Schwartz
Vice President
Independence Solar, LLC