



Ms. Kaitlyn Kelly
Renewable Energy Program Coordinator
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

28 October, 2016

Re: Marine Solar, LLC comments to DOER Next Generation Solar Incentive Straw Proposal

Dear Ms. Kelly:

Marine Solar, LLC would like to urge the Department of Energy Resources (“DOER”) to consider allowing the Ciel et Terre, International floating solar system to qualify for the same adder incentives as solar systems using any equipment that qualifies as “canopy” systems as described in the Straw Proposal.

Marine Solar, LLC is a solar development company specializing in floating solar PV systems and has a close relationship with the manufacturer, Ciel et Terre. We are based in New England and we intend to develop floating solar projects in commonwealth of Massachusetts.

The primary rationale for incentivizing the use of floating solar is that it will reduce pressure on developers to use prime agricultural and forest lands for siting larger scale solar installations of 1MW or more. This will help the State to preserve existing passive open space, agricultural land and other as well as enable the State to meet its renewable energy goals without consuming other public goods or resources.

We would advocate for permitting the use of most industrial water bodies such as drinking water reservoirs, lagoons and water processing ponds, as floating solar sites. Floating solar islands actually improve water quality in the instances where they are deployed. The floats and panels shade the water and substantially reduce evaporation, as well as algae growth and warming. The flotation systems are composed of food grade HDPE and have been extensively tested before use in potable water sources in both the UK and Japan.

The Ciel et Terre flotation system has been widely deployed in a range of environments and is commercially proven in over 40MW of installations. By year-end 2016, Ciel et Terre expects to have over 100MW of floating solar PV fields operating.

Specifically, we recommend that DOER amend the proposed definition of “Canopy” to include the following additional language in bolded italics below:



“on top of a parking surface, pedestrian walkway, agricultural land, canal *or other body of water* in a manner that maintains the function of the area beneath the canopy”.

Thank you for managing this important process and please do not hesitate to call or write for any further assistance in promulgating this policy.

Regards,

A handwritten signature in blue ink, appearing to read "Tom Cleveland".

Tom Cleveland, Managing Partner
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A handwritten signature in blue ink, appearing to read "Jacques Guillet".

Jacques Guillet, Managing Partner
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