

To Whom It May Concern:

On behalf of the University of Massachusetts Amherst, I am writing to provide input on the recently filed RPS Class I Emergency Regulation (225 CMR 14.00) for the SREC II Program.

As you may know, our campus is just beginning a very large 4 MW solar project on 8 different sites across our campus including two parking lot canopy systems and 6 rooftop solar projects. This project is very exciting for us as it will be one of the largest solar projects in the state and will generate over 6 million kWh per year, almost 20% of our purchased electricity, helping our campus get closer to meeting the Executive Order 484 renewable energy mandate.

The project is significantly delayed in large part due to the time it took for DOER to make a decision on the SREC II cap allocation. Our developer submitted our application in late 2015 but could not commit to ordering equipment and lining up sub-contractors until once the emergency regulation was issued in January. DOER is actually supporting this project. We submitted an application for a Leading by Example Clean Energy Grant of \$500,000 which is currently pending. Our primary concern is that DOER has decided that January 8, 2017 is the construction completion deadline. This only provides our contractors less than one construction season (this summer and fall) to complete a very large and complex project of both parking canopy systems (which entails major construction), and rooftop installations. What will be the process for filing for an extension if our construction is not completed by the deadline?

We are going to try our hardest to finish these projects by January 8, 2017, but we anticipate many obstacles relating to construction, permitting, scheduling, winter weather, labor, etc. to make meeting this January deadline a challenge. Therefore, I would like to recommend to DOER that parking canopy solar projects – given the complexity and intensity of the construction – be considered for a longer construction deadline, perhaps 6 more months (July, 2017).

Thank you for your time and consideration,

Ezra Small  
Campus Sustainability Manager  
Physical Plant