

May 27, 2016

Commissioner Judith Judson
Massachusetts Department of Energy Resources
100 Cambridge St, Suite 1020
Boston, MA 02114

Re: SREC II Emergency Regulation Comments

Dear Commissioner Judson,

Thank you for the opportunity to comment on the SREC II Emergency Regulations (225 CMR 14.00) that were published on April 8, 2016. The Northeast Clean Energy Council (NECEC) and our member companies are appreciative of your work to ensure a smooth transition for the solar industry to a new policy and incentive framework and are grateful for the opportunity to provide comments on these emergency regulations. We also want to thank DOER and the Administration for your leadership in addressing issues that affect the growth of the solar – and other clean energy – industries in Massachusetts. We look forward to working with you on finalizing these regulations, as well as designing the successor to the existing SREC program.

NECEC is the lead voice for hundreds of clean energy companies across the Northeast, helping to grow the clean energy economy. NECEC's mission is to create a world-class clean energy hub in the Northeast delivering global impact with economic, energy and environmental solutions. NECEC is the only organization in the Northeast that covers all of the clean energy market segments, representing the business perspectives of investors and clean energy companies across every stage of development. NECEC members span the broad spectrum of the clean energy industry, including energy efficiency, renewable energy, CHP, energy storage, fuel cells and advanced and "smart" technologies.

NECEC is fully in support of the comments submitted earlier today by the Solar Energy Industry Association (SEIA), and we respectfully request one additional modification to the SREC II Emergency Regulations.

With respect to the deadline for projects to reach mechanical completion, NECEC recommends an approach similar to that taken at the end of the SREC I program - allowing a one-time, four-month extension for projects that can demonstrate 50% expenditure of total estimated construction costs by January 8, 2017. Additional requirements could include an executed EPC contract and payment of interconnection costs.

We respectfully request this extension as a one-time response to short-term current construction industry realities in Massachusetts. Construction companies and their subcontractors are experiencing short-term staffing constraints in response to a number of conditions that have caused construction delays for the industry this year – including both the extension of the ITC and a large backlog of projects in the Commonwealth that have recently moved forward after the net metering caps were raised.

Thank you for your consideration. NECEC and our member companies are available as a resource to you throughout this process. Please do not hesitate to be in touch if we can provide any assistance.

Sincerely,



Peter Rothstein, President

CC. Janet Gail Besser, Executive Vice President