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May 27, 2016

[via email to: DOER.SREC@state.ma.us]

Re: Comments – RPS Class I Emergency Regulation (225 CMR 14.00)

Greetings to the DOER,

Pioneer Valley Photovoltaics Cooperative, Incorporated (PV Squared) is a full-service design/build solar company, founded in 2002. For many years our business has been focused on residential and small to medium-sized commercial/educational/nonprofit clients seeking to invest in solar PV systems. It's fair to say that our success as a Massachusetts clean energy company can be attributed in large part to the state's policies encouraging solar development over the years. We support the implementation of the SREC II program extension providing a smooth transition from the SREC II program to its successor.

As you can imagine, we are in continual discussions with many prospective PV clients as they face significant investments in solar energy. These clients deserve as much clear information as we can provide them about costs, incentives, expected operation, and other attributes of the PV system that will best meet their needs. With regard to the incentives, we would like to see more regulatory certainty so that we can better advise our clients during the transition period.

Specifically, PV Squared along with other stakeholders request clarification from the DOER regarding the anticipated transition date from SREC II to the successor program. Solar PV projects sized greater than 25 kW_{DC} have been assigned a definitive target date for substantial completion under SREC II. In contrast, projects 25 kW_{DC} and under face much financial uncertainty regarding the transition date. We suggest that the regulations state that projects equal to or smaller than 25 kW_{DC} will transition to the successor program on January 8, 2017 or the effective date of the successor program, whichever comes later.

Additionally, we recognize that the extension of SREC II is likely to influence the market's overall dynamics, particularly with regard to potential oversupplied conditions. Clean Asset Partners has provided written comments with suggestions for maintaining "balance" in the SREC II market during this transition. We encourage DOER to consider strategies to achieve market balance, as was the DOER's intent prior to the emergency regulations.

Thank you for this opportunity to comment.

Sincerely,

William Stillinger, President