



Via Electronic Mail

May 27, 2016

TO:

Judith Judson
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA

FROM:

Sara Rafalson
Director, Policy & New Markets
Sol Systems
Phone: (202) 588 – 6459
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Re: RPS Class I Emergency Regulation (225 CMR 14.00)

Dear Commissioner Judson,

Please find the comments of Sol Systems on RPS Class I Emergency Regulation. We thank you for the opportunity to provide comments.

Sincerely,
/s/ Sara Rafalson
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Director, Policy & New Markets
Sol Systems
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I. Introduction

Sol Systems is a solar energy finance and investment company headquartered in Washington, D.C. Our business partners with local and regional developers to provide financing for commercial and small utility-scale solar projects. We also assist in the financing of solar energy systems through the aggregation and sale of solar renewable energy credits (SRECs).

To date, we have financed nearly 450MW of solar across the United States. In Massachusetts, we have financed approximately 21MW of projects ranging from 159kW to 5.5MW in size. These projects are with schools, municipalities, and corporations. Additionally, we have 716 customers and 7.6MW under contract through our SREC aggregation business.

Sol Systems has been a participant in the Massachusetts solar market since its inception, and we look forward to engaging with DOER in creating a sustainable business environment for the Massachusetts solar industry. We are supportive of the RPS Class I Emergency Regulations and offer comments to ensure that the Emergency Regulation allows for a smooth transition to the SREC II successor program.

II. Key Issues

1. Carport Construction Timelines

- a) Given the long timelines associated with procuring equipment and construction carport projects, Sol Systems recommends that DOER change the milestones within the Emergency Regulation so that carport projects must reach another milestone, *steel delivery*, within nine months of April 8, 2016 in order to qualify for the SREC II program.

III. Discussion

1. Carports Should be Granted a Longer Timeline to Qualify for the SREC II Program

- a) Under the RPS Class I Emergency Regulation, all Renewable Generation Units with a rated capacity greater than 25kW must receive its authorization to interconnect or permission to operate from its local distribution company within nine months of April 8, 2016 unless the Unit can demonstrate that its interconnection depends only upon receipt of notice of authorization to interconnect from the distribution company. Sol Systems views this as problematic, as all Units over 25kW – rooftop, ground mount, and carport structures – are assumed to have equal construction schedules under this requirement. However, given that carport structures face longer lead times in procuring the steel necessary for fabrication, we recommend that carports be granted SREC II eligibility based on *steel delivery*, meaning when steel for projects with SQA's has been delivered on-site.

As background, a standard rooftop project can take anywhere from 3-5 months from contract signing to substantial completion. For a carport of a comparable size, the period from contract signing to substantial completion takes about 10 months. The additional time required for carports is largely due to the fact that they must be custom built for each individual site. Once you receive a notice to proceed (NTP) with steel fabrication and put in an order for delivery, it can take 10-12 weeks from the time the fabrication is ordered to the time that the steel is delivered. This timeline is especially elongated when carports are “premium” carports, such as the photo below, which require much more steel. During this 10-12 week waiting period, the EPC may begin site work (e.g. digging foundations), but most work must be put on hold until the steel is delivered. Then, upon delivery of the steel, columns must be erected, and the pieces that have been delivered must be put together. This sequence of events must occur before the electrical work can even begin. With such long lead times required for carports, carport structures are disadvantaged under the RPS Class I Emergency Regulation as written, even if timing for diligence and financial closing matched the same timeline of a rooftop or ground mount project (for this reason, we are only submitting comments for the carport projects in our portfolio – not the rooftop and ground mount projects that are pushing for SREC II deadline).



Given the added 10-12 weeks of lag time associated with the building of carport structures, Sol Systems recommends for the RPS Class I Emergency Regulation to allow carports additional time to qualify for the SREC II program by changing the milestone from authorization to interconnect to *when steel is delivered on-site*.



Figure 1 Given the additional time required to construct a carport structure, Sol Systems recommends a change in the milestone to ensure carport structures meet the SREC II deadline. Photo credit: Solaire Generation <http://solairegeneration.com/products/>