



**Comments of IGS Energy on
Solar Renewable Energy Credits II Emergency Regulations
225 CMR Department of Energy Resources 225 CMR 14.00
Renewable Energy Portfolios Standard – Class I**

May 27, 2016

IGS Generation, IGS Solar and IGS Energy, (collectively “IGS Energy” or “IGS”), appreciates the opportunity to provide comments on the proposed Emergency Regulations to extend the Solar Renewable Energy Credits II (SREC) program. We appreciate the leadership from the Baker Administration and Massachusetts Department of Energy Resources (DOER) on facilitating a smooth transition from the SREC II program.

IGS Energy and its affiliated companies provide a diverse range of energy services to customers throughout the country. Those products and services include retail natural gas and electric supply, distributed energy generation resources (“DER”), demand response, frequency regulation, energy efficiency and home warranty products. IGS serves over 1 million customers in over 15 states including electric, natural gas and distributed energy customers in Massachusetts.

While regulations are always subject to change, DOER’s focus on transparency and gradualism is key to maintaining a stable regulatory environment that enables businesses to offer a smooth customer experience and to reduce inefficiencies – and therefore costs – in the business cycle.

DOER’s issuance of the Emergency Regulations was a critical step in transitioning from the SREC II program and IGS applauds and supports the proposal to extend the SRECII program as it will help create a bridge to the successor incentive program while maintaining some level of momentum in the market. IGS supports the proposal’s extension provisions that based on a date certain, rather than an allocation of additional number of megawatts.

Furthermore, given the relatively tight timeframe for bringing projects to mechanical completion by January 8, 2017, solar firms are currently making investment decisions based on the Emergency Regulations. IGS’s threshold recommendation to the DOER is to not make any changes from the proposal regulations that would negatively impact projects qualified under the Emergency Regulations as this would jeopardize these investments, cause confusion, and create uncertainty in the solar market

With regards to the successor program, IGS understands that DOER will undergo a deliberative stakeholder process which will take some time before a final program is complete. Although the SRECII extension allows mature projects to continue to completion during the development of a new program, the sales and development of new commercial, municipal, and community solar projects – which take approximately 6 – 12 months – will slow or even halt during the period where there is little to no clarity on the parameters of the new program. Therefore, IGS urges the



DOER to identify and decide upon key threshold items as early as possible in the process, even if all of the details are not yet finalized. This includes issues such as the structure of the new program (SREC, declining block), parameters that indicate the level and duration of incentive compensation, and whether any segments will receive additional consideration (community solar, low income, brownfields, etc). This will help companies to begin discussions with customers before the program is finalized and smooth the transition to the successor program.

We appreciate the opportunity to comment and look forward to continuing to work with DOER and other stakeholders during the development of and transition to the next phase of solar in Massachusetts.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'K' followed by a series of loops and a long horizontal line extending to the right.

Katie Bolcar Rever
Director, Legislative and Regulatory Affairs
IGS Energy
krever@igsenergy.com