



Chase Systems LLC

Renewable Energy Development and Consulting

Department of Energy Resources
100 Cambridge St.
Suite 1020
Boston, MA 02114
Attention: Michael Judge
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DOER.SREC@state.ma.us

8/26/13

Subject: Comments on SREC II solar incentive program

Dear Mr. Judge:

We have the opportunity to improve with the SREC II program. In reviewing the August 12 SREC II revised proposal, I have the following feedback.

- Most importantly, provide a clear, simple, bankable revenue stream from the SREC II program. We need a mechanism that guarantees the "Auction Floor Price" minimum is a real minimum, and will be paid on a timely basis.
- Second, restrict Forward Minting to the direct ownership sector to boost low market penetration of direct ownership by individual, small businesses and as part of "Community Solar" projects only.
 - 3rd party ownership should be excluded. This model is already very successful and has a large majority of market share in the small system space.

Thank you for your consideration.

Sincerely,

Richard Chase
Principal, Chase Systems

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