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#### Comments on Solar Carve-Out II – Updated Proposed Design

In regards to the Incentive Levels: It is very important to establish fixed incentive levels for each sector of solar developers. In my opinion, it is best to determine a fixed value of SRECs for each sector, i.e. residential, commercial and industrial. Page 6 of the document highlights the disparity in types of systems, with the lion's share of the systems being large commercial solar farms. This will certainly meet the designated goals of total solar that the state is seeking, but it will limit the participation to large venture capital backed companies. It does not promote residential installations to be owned by the actual resident. There are small Massachusetts businesses who install small roof mounted solar systems, which the homeowner can purchase. The long term value of the SRECs is important for this market. Homeowners need to know what the value of the SRECs will be over a 10 year period. They can then be confident that the system will be worth owning, even if it is a considerable investment now.

The questions should be asked, Is the state just trying to increase solar capacity any way possible? Or is it trying to make solar affordable to the homeowner so they can take advantage of the incentives? What good are the incentives if only large, venture capital backed companies have the upfront resources and risk tolerance to take advantage of them? It seems like the state is establishing the same kind of energy model as big oil, etc., where large companies will control it. In my opinion, the intent of the solar carve out was to promote home-owners to benefit from the program.

The new solar carve out program seems to be trying to level the playing field as seen on page 12, but it does not go far enough in my opinion. It should also provide guaranteed SREC values to individual systems owned by homeowners. It could place a maximum size of a qualified system, but it needs to make sure the individual small system owner knows the value of the SRECs over the duration of the program. This is especially important now that the MassCEC rebates are due to be phased out next year.

Third party ownership and large commercial solar farms have an unfair advantage in the marketplace because they can take the federal tax credits and the depreciation federal tax credits. Property owners cannot take the depreciation federal tax credits. Third party owners are also able to bundle SRECs and cut deals with buyers at preferred rates because of the volume that they are dealing. I don't think third party owned systems should have any advantages, it is unfair to the people who would like to own their own systems.

In summation, DOER should be doing everything in its power to promote individual ownership of solar systems, and should have a huge promotional program to inform the general public about the incentives. Most people do not know the incentives, even as they exist now. They are usually misinformed by third party owned installers, and make an uninformed decision.

This state is very progressive in renewable energy policy and has a unique opportunity to develop a program, which will provide stable SREC values to residential or neighborhood solar gardens. It is imperative to get it right this time, or we will continue to see large scale solar farms being developed, with large companies prospering, while the general public misses out on a tremendous opportunity.

Sincerely,

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