

From: John Soininen [mailto:jsoininen@eolian-energy.com]
Sent: Wednesday, August 21, 2013 5:57 PM
To: SREC, DOER (ENE)
Subject: Comments: SREC-II Updated Proposed Design

DOER,

I'm writing to provide a comment on the current proposed concept of creating SREC factors to promote certain forms of development. Overall I believe this to be a good idea, however, I would suggest that it may not be beneficial to categorically create a strong disincentive to develop larger ground mounted projects. I believe it is appropriate to discourage the use of agricultural land and productive forest land for these types of projects, but I think it would in fact be beneficial to encourage large ground mounted projects on industrial sites or other previously impacted sites. As such I would suggest that you seriously consider adding two additional property types to the "Landfill & Brown Field" category with a 0.8 SREC factor. I would suggest that you make the following two property types eligible for a 0.8 SREC factor as well.

1. Industrial Property – Property that is zoned as industrial by a municipality has been specifically designated through the local planning process as appropriate for this type of development and will typically be in areas with more robust infrastructure hence in line with municipal and utility/grid objectives.
2. Previously developed sites – If a solar PV installation does not create any new impervious cover on a site it should be incentivized (ie if as viewed from the sky or in plan view solar panels do not cover any green space). So if solar panels are being installed on a site that has a dilapidated building that is demolished, a large parking area or some combination thereof the project should not be penalized for being large and reusing an under utilized property.

Thank you in advance for your consideration of these comments.

Respectfully,

John

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