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To: Department of Energy Resources
From: Invaleon Technologies Corporation
RE: SREC-II Final Proposed Design

I am writing this letter in response to the recent DOER Stakeholder Meeting held on August 12, 2013. On behalf of Invaleon Technologies Corporation and our affiliate partners in Massachusetts, we praise the on-going efforts of DOER in their continued support of a prosperous and essential solar industry.

Invaleon Technologies Corp. is a solar developer in Massachusetts, and has been operating in the Commonwealth for over three years. Since our entrance into the solar industry, we have worked for clients from all corners of the market; residential homeowners, small businesses, and even municipalities and towns. We have experienced first-hand the specific and individual needs that has risen from our diverse base of clientele, and have bridged their concerns with the policies and regulations set forth by DOER.

We understand that DOER has a clear intention on protecting the steady growth of the solar industry in Massachusetts, and we strongly support this movement. However, we feel that certain aspects of the new proposed "SREC Factor", as referenced in slide 12 of the August 12, 2013 presentation, has a very unintentional restriction to the agricultural community. Some of our agricultural clients that wish to own solar assets to subsidize their income were disappointed that their future projects were categorized as part of the "controlled growth" sector.

In the past several years, we have seen the influx of large-scale solar fields that over-saturated the Massachusetts solar market. We do not feel that solar projects on agricultural lands should be associated with this negative stigma. It is fair to say that large solar projects have the potential to be constructed on open farm lands, but we urge DOER to closely examine the specific purposes that solar would serve for the farmland owners. We can agree that if farmlands were to be converted completely into a solar field, that it would not produce any value to the farming community. However, in certain instances, we suggest that if a proposed solar project would generate revenue that would subsidize the existing income of the farmer, then that project should have the potential of bringing economical relief to the farmland owner.

Currently, it is extremely difficult for the agricultural community to receive the full benefits of solar in Massachusetts. Farmland owners are only paid a small percentage of the total revenue from a solar system in the form of land lease or land purchase. The biggest benefit of solar goes to the system owners. With this understanding, we have built a foundation and model with our agricultural clients that allow them to do so. If DOER groups all agricultural solar projects with a competitive SREC bid factor, this would jeopardize an entire segment of the solar market.



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A farmer sacrifices a greater value in slotting solar to prime pasture or valuable timber acres. Any farmer that continues to engage in agricultural activities and/or crop harvesting must be eligible for a secured SREC factor in respect to dual investment in smaller crops that should be compensated equally for the equal acreages. Failure to provide such economic support will cause farms to vanish at a faster rate due to slow financial decline in the Massachusetts farming industry. An absence of SREC economical support will also deprive government facilities from substantial discount power as system owners will try to recoup their lost investments through higher Power Purchase rates. Ultimately, we are less environmentally responsible, and end up causing more farms to vanish or sell to real estate development, which is a burden to cities and towns in the Commonwealth.

Invaleon feels strongly that our agricultural clients should receive the same support from DOER as would commercial roof-tops and residential owners. We understand and appreciate the notion of regulated growth in the Massachusetts solar industry, and we feel that so long as a farmland owner's income is subsidize, and not replaced by solar, that their solar projects not be jeopardized by SREC-II value uncertainties.

Invaleon urges strongly for DOER to consider adding agricultural solar projects owned by farmland owners with existing agricultural revenue that exceeds those of potential solar benefits, to be placed in a fixed SREC factor group. The criteria of ownership and required subsidized solar earnings will help maintain control of solar on farmlands and prevent mega-solar fields to be constructed to exploit the availability of open farmlands.

We would strongly welcome the opportunity to discuss this concern with DOER prior to the finalization of the SREC-II program. We believe in a responsible program that is fair, and protects the needs of all participants in the state of Massachusetts.

Thank you very much for your consideration of our comments and concerns, should you have any questions, feel free to contact me at any time.

Very truly yours,

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