
Via Email to: DOER.SREC@state.ma.us

August 26, 2013

Department of Energy Resources
100 Cambridge Street
Suite 1020
Boston, MA 02114
Attention: Dwayne Breger

Dear Mr. Breger,

Thank you for the opportunity to provide these comments on the Department of Energy Resources' Post 400 MW Solar Carve-Out Market Design Proposal and for conducting the stakeholder meeting held on August 12th providing an update on the Proposed RPS Solar Carve-Out II design.

As a locally owned, small business with a vision of providing cost efficient solar energy to the smaller consumers of Massachusetts, we support DOER's goals for increased emphasis on development in the residential and small business market sectors.

Easy Energy generally supports the Policy Objectives and Key Design Features as outlined by the DOER at the August 12th stakeholder meeting. One Key Design Feature of the proposed market design is: "Financial incentive will differentiate between market sectors." To that end DOER has suggested that the residential systems (smaller than 25 kW) receive a higher SREC factor of 0.9. DOER has also proposed pre-minting SRECs for residential, not third party owned, systems. We agree that there should be financial support to aid in primary ownership thus increasing participation of small commercial and residential customers in the Massachusetts Solar Market. In our opinion, the pre-minting of SRECS should not be extended to third party owned systems as this differential in support is more in line with the DOER policy objectives of controlling ratepayer costs and addressing the financing barriers limiting direct ownership.

Easy Energy would like to suggest a new view of the existing market place that will specifically support controlled market growth and return increased economic benefits to the ratepayer and the State. We propose that a higher SREC factor (0.9) and forward minting be applied to "Community Solar" projects.

A Community Solar project can fit into the DOER proposed Differentiating Market Sectors with minor adjustments. A Community Solar project may be roof mounted (any size) or Ground mounted, less than or equal to 500 kWh, with less than 67% on-site electric use annually. This is no different than the proposed Differentiating Market Sectors SREC factor definitions provided at the stakeholders meeting except that we suggest a higher SREC factor of 0.9 and we suggest that the Community Project have the added requirement that some acceptable portion of the electricity is designated for residential and small business consumers' use.

This view of the market sectors will:

- a) Expand, and make more sustainable, clean energy industry growth within Massachusetts;
- b) Overcome the reality that 85% of residential customers are precluded from participating the solar revolution due to site physical limitations;
- c) Improve the economic benefits for Massachusetts through increased participation of smaller rate payers while still capitalizing on the economy of scale of larger projects;
- d) Simulate residential project ownership, thus providing a monthly reduction in residential consumer's electric bills, leading to increased consumer spending.

Easy Energy looks forward to helping advance Massachusetts clean energy infrastructure goals by providing small consumers with services that save them money and make Massachusetts stronger for decades to come.

Thank you and certainly do not hesitate to contact me with any questions or clarifications.

Very truly yours,



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