



TO: Dwayne Breger, Director of Renewable and Alternative Energy Development  
FR: Rob Sargent, Environment MA  
RE: Comments: SREC-II Updated Proposed Design  
August 26<sup>th</sup>, 2013.

On behalf of our more than 50,000 members and activists across the Massachusetts, Environment Massachusetts appreciates the opportunity to offer support for and comments on the Department of Energy Resources' plans to dramatically expand the solar carve-out program.

Over the past year, we have spoken to more than 100,000 residents in all parts of Massachusetts. We can attest that solar energy enjoys tremendous public support. People like it because it is clean and local and because it is an energy source that has no fuel costs. They also like it because it is a potent symbol of a smarter and cleaner energy future for Massachusetts. In addition to strong public support, solar is supported by a broad range of stakeholders, including businesses, local officials, and civic organizations.

Solar is on the rise in Massachusetts. Last year, Massachusetts almost doubled its solar capacity. Forward-thinking policies; including the solar carve-out (SREC program), net-metering, and programs like Commonwealth Solar and Solarize Massachusetts have lined up with the strong public and institutional support and demand for solar energy to make Massachusetts a national solar leader.

In 2007, when Governor Patrick announced a goal of getting 250 MW installed within 10 years, many doubted it was achievable. Now, we have surpassed that goal and are reaping the economic and environmental benefits of a rapid expansion of solar. Our recent report, [\*"Lighting the Way: What We Can Learn from America's Top Solar States"\*](#), highlighting Massachusetts as a solar leader—10<sup>th</sup> in nation installed solar per capita, shows what can be done with smart policies and a strong commitment from the top. The progress we've made to date, should give us the confidence that we can take solar energy to the next level.

We've been building support for an ambitious and achievable goal to put solar on at least 50,000 roofs in the state by 2020 and a quadrupling of the state's solar goals. To that end, we strongly support the expansion of the solar carve to 1600 MW. To put this amount of energy in perspective, 1600 MW is the approximate annual energy

production of Somerset's Brayton Point Power Plant, the largest coal-fired power plant in the region.

Just last week, Jon Wellinghof, the current chair of the Federal Energy Regulatory Commission (FERC) predicted that a combination of lower costs and energy storage advancements will result in solar energy overtaking all other energy sources. We agree with his assessment and urge the Patrick Administration to remain bullish on solar, so that we can accelerate and remain a national leader.

The current SREC II proposal is a thoughtful proposal that acknowledges the importance of continued policy support in the short-term with the reality that the cost of solar will come down as it achieves scale.

Solar has a value that goes beyond the cost of electricity. On peak demand days over the summer, when everyone is cranking their air conditioning, there is plenty of sunlight shining on our rooftops that we can capture to meet this demand. The price of solar is falling, and the policy DOER is proposing will guarantee long-term commitments, helping the industry and lowering the cost of financing. And these benefits are only compounded by solar's environmental and health benefits.

We will defer to the experts on the minutae. But, we believe any solar policies must recognize:

- The value of solar and distributed generation (in reduced peak demand, avoided T&D, and in enhancing the resilience of the grid, particularly on high demand days).
- The environmental and local economic benefits of solar
- The importance of expanding and maintaining access across sectors and classes of customers, including residential and small business customers, multi-family dwellings, local governments, and other institutions.

There is no doubt that Massachusetts has made great strides in promoting and supporting solar energy. Now it is time to secure our place as a national leader in this industry. Today Environment Massachusetts urges the DOER to listen to what the public, community leaders, organizations, and businesses across the state have to say, and increase the Solar Carve-Out to 1600 MW.

Please do not hesitate to contact me at 617-747-4317, if you have any questions.