



August 26, 2013

**VIA ELECTRONIC MAIL**

Massachusetts Department of Energy Resources  
doer.srec@state.ma.us

**RE: Sierra Club Comments Regarding Massachusetts RPS Solar Carve-Out II**

To Whom It May Concern,

On behalf of the Sierra Club, I am submitting the following comments regarding the post-400 MW policy development process, and the changes presented at the August 12<sup>th</sup> Stakeholder Meeting. Thank you for the opportunity to provide comments as Massachusetts moves forward as a leader in solar generation. Sierra Club continues to support the Department of Energy Resource's (DOER's) goal to expand solar photovoltaic (PV) installations in Massachusetts. A robust and thriving solar market will benefit Massachusetts ratepayers in both the short and long-term by creating jobs and decreasing dependence on harmful and climate-damaging fossil fuels.

Overall, the Sierra Club supports the development of the proposed SREC II program as a means to maintain robust growth and achieve the Governor's goal of 1,600 MW installed PV capacity by 2020, while ensuring program sustainability as solar PV costs, hopefully, continue to decline. It is important that the transition to the SREC II program take place as quickly as practicable, to ensure continued support of solar development and to reduce uncertainty and gap time for developers.

The proposed program encourages small and residential PV installations with direct ownership, which market trends have shown to be an increasingly small contributor to total annual installed capacity. Allowing for a high SREC factor for these projects, as well as the option of forward minting, will help to encourage and reward the installation of smaller residential and direct-owned PV. The Sierra Club recognizes the many public policy benefits that stem from increased prevalence of residential PV, and applauds DOER for their focus on encouraging this development. For this reason, we encourage DOER to not differentiate between customer-owned and third party-owned systems. Third party-owned systems can help to lower barriers to entry in the solar market for homeowners and promote market expansion for residential PV installations.

PV installations on brownfields sites should be encouraged along with residential and smaller-scale projects. Brownfields redevelopment is costly, due to remediation costs and the rigorous permitting process associated with such sites. However, this

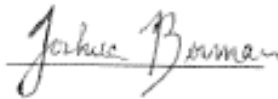
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repurposing yields a beneficial, environmentally-conscious, and productive use of otherwise low-value land. DOER should incentivize such projects by taking these investments and benefits into account within the SREC program. Sierra Club thus recommends that the SREC Factor for brownfields projects be set at .9, the same level as residential and other small-scale projects. Furthermore, the SREC Factors should specify that brownfields projects of all sizes are included in this market sector to avoid confusion and overlap with the "managed growth sector," which includes other large projects.

Finally, we recommend that DOER attempt to provide some certainty concerning the projects which will be subject to a competitive bidding process within the managed market. These tend to be large-scale solar projects and can have long lead-times and development processes. In order to ensure that developers and investors will continue to pursue these beneficial projects, DOER should explore ways they can provide a higher degree of certainty regarding future demand and market capacity for these projects.

The Sierra Club appreciates the opportunity to comment on the ongoing policy development process and encourages DOER to maintain their record of transparency and stakeholder involvement. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Joshua Berman". The signature is written in dark ink and is positioned above the printed name and title.

Andrea Grossman

Joshua Berman

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