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Sent: Friday, August 23, 2013 3:46 PM
To: SREC, DOER (ENE)
Subject: Comments: SREC-II Final Proposed Design

First I wish to thank Governor Deval Patrick and his Clean Energy team for the last five years of tireless efforts and commendable results in growing the solar industry in Massachusetts. The SREC program proposed for 2014 primarily addresses boosting the idea localization of power, where 67% of the power created is used on site. This renewable and affordable electricity will help homeowners to afford staying in their homes even as Aging in Place and living on fixed income. It will also help cities and towns to balance their budgets by decreasing energy costs to run and air-condition schools and other municipal buildings. Furthermore, localization of power lessens the strain on our aging power lines and less energy is wasted in transit.

As a PV system owner and a solar developer for a Massachusetts based solar panel installer RevoluSun, my two suggestions come from field experience over the last two years. Presently, 95% of homeowners I talk to have never heard the acronym SREC, nor do they know about the amazing programs the state of Massachusetts has been offering during the last three years. My concern is, as your report charts illustrate, that the message is not reaching enough homeowners or small town officials. My suggestion is a Massachusetts Renewable Energy and Efficiency brochure explaining the SREC and the virtues of locally produced power. Also, please make a PDF file available on the DOER website that clearly defines the SREC.

My experience with local municipal electric departments is that there still exists moderate resistance to solar industry's development in some communities. In light of the federal and state incentives during the last four years, many municipal electric utility departments still don't offer "true" net-metering relationships, have cumbersome 12 page interconnection applications and thus discourage many residents to go solar.

There is a level of fear that solar inverters could back-feed power to the street during power outage and injure workers who are trying to restore power to the grid. There is also fear in some "bedroom community" municipalities that at certain, although few, times during the year when solar generation is high and demand is low (such as a bright April mid-day), the total power passing the town meter interconnecting with the National Grid would be too great and cause power to back-feed and cause technical problems. These worries, warranted or not, are stagnating progress in our state's less industrialized municipalities.

The new proposed SREC program will help to promote medium-size solar projects on schools and other government buildings where 67% of the power is consumed by the building itself. However, it is still difficult for a town or city to realize a 30% federal credit since town and cities don't have this tax liability. I believe that this disadvantage has invited third party system ownership into the solar industry and caused inappropriate redirection of government funds. In addition, third-party financing gives money to out-of-state companies and to out-of-state installers. Let's find a way to include the non-profit entities like towns, schools and churches on a level playing field with federal taxpayers and keep the financial benefits of solar interconnection in Massachusetts!

If towns and cities were more equally supported, we would see more town and city owned solar investment on municipal buildings. As owners, they would also have the control and discretion to temporarily disconnect these medium size systems from production in those rare "bright April mid-day" instances that worry the municipal utilities at present.

Thank you for this opportunity to share my thoughts and field experience.

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