

**Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs
DEPARTMENT OF ENERGY RESOURCES**

**RENEWABLE ENERGY PORTFOLIO STANDARD
(225 CMR 14.00)**

GUIDELINE

RPS Solar Carve-Out II Frequently Asked Questions (FAQ)

July 29, 2014¹

1. Can projects from multiple market sectors qualify on the same parcel of land?

Yes, projects from multiple market sectors may qualify on the same parcel of land provided that no more than 6 MW DC of combined SREC I and SREC II capacity are located on the parcel.

2. Can multiple 25 kW ground mounted projects be located on the same parcel of land and qualify under Market Sector A? Can multiple ground mounted projects less than 650 kW DC that provide less than 67% of the power they generate to an on-site load be located on the same parcel of land and qualify under Market Sector C?

No, pursuant to 225 CMR 14.05(9)(l)2.a. and 225 CMR 14.05(9)(l)2.b.ii., respectively, it is not permissible to qualify multiple ground mounted projects less than 25 kW DC or multiple ground mounted projects less than or equal to 650 kW DC that provide less than 67% of the power they generate to an on-site load on the same parcel of land.

3. Do system expansions affect market sector eligibility?

Yes, expansions are allowed to be behind the same revenue grade production meter as the original PV system provided they would not result in a change of the Market Sector the project was originally qualified under. Expansions that would result in a change of the Market Sector are eligible provided they utilize a new revenue grade production meter and qualify as a separate Generation Unit. Expansions that violate the rules regarding multiple project types on the same parcel of land as clarified in the answer to the second question of this FAQ are not eligible. The eligibility of expansions to Managed Growth Generation Units is covered under section 6(A)iv of the [RPS Solar Carve-Out II Assurance of Qualification Guideline](#).

4. Can ground mounted systems with multiple on-site meters that have an aggregate load of 67% or more of the estimated annual output of the system qualify under Market Sector B?

¹ This Guideline may be updated from time to time as is needed

No, a ground mounted system must be behind a single utility meter that is capable of using 67% or more of the electricity generated by the PV system in order to qualify under Market Sector B.

5. Can projects in Market Sectors A-C be confident that they meet the eligibility criteria to qualify prior to interconnecting?

Yes, projects in Market Sectors A-C may seek an Assurance of Qualification. The Assurance of Qualification will list the specific conditions that they need to meet upon interconnecting in order to obtain a Statement of Qualification in the specific Market Sector.

6. Can Managed Growth Sector projects receive Class I RECs before they begin generating SREC IIs?

Yes, because Managed Growth Sector projects have much less flexibility regarding the quarter in which they can begin generating SREC IIs. For example, a project in the 2015 Managed Growth Block that is interconnected in September 2014 would have no ability to generate any SREC IIs in Q3 or Q4 2014. A project in Market Sectors A-C would have no such limitations regarding when they can begin generating SREC IIs.

7. Do Community Shared Solar Generation Units need to demonstrate that 100% of their output meets the participant requirements outlined in 225 CMR 14.02 upon interconnection?

No, while the Department encourages Community Shared Solar Generation Units to make this demonstration at time of interconnection, the Department will allow Community Shared Solar Generation Units an additional period of time to make this demonstration. Community Shared Solar Generation Units will have until 10 days before the NEPOOL GIS reporting deadline for the first quarter in which they will be generating SREC IIs to provide a completed Schedule Z that demonstrates 100% of the project output meets the participant requirements for qualifying as a Community Shared Solar Generation Unit.

For example, if a Community Shared Solar Generation Unit interconnects on January 1st, it will have until July 1st (10 days before the Q1 NEPOOL GIS reporting deadline) to provide DOER with a copy of its completed satisfactory Schedule Z. Likewise, if the same project interconnected on March 31st and elected to begin generating SREC IIs in Q1, it would also have until July 1st to provide its completed satisfactory Schedule Z to DOER. This effectively grants all Community Shared Solar Generation Unit projects a minimum of 3-6 months to provide a completed satisfactory Schedule Z.

The Department will memorialize this condition in a Generation Unit's Statement of Qualification. Should a facility seeking qualification as a Community Shared Solar Generation Unit not provide a satisfactory Schedule Z by the applicable deadline, it will have its Statement of Qualification suspended until it is able to provide a completed satisfactory Schedule Z.

8. Can multiple franchisees of a corporate entity participate as separate participants in a Community Shared Solar Generation Unit?

Yes, provided the franchisees are independent legal entities from one another, they all may be considered separate participants under a Community Shared Solar Generation Unit.

9. Can a single entity be a participant in multiple Community Share Solar Generation Units?

Yes.

10. Is a net metering credit purchase agreement or power purchase agreement with an off-taker that qualifies as low or moderate income housing sufficient to qualify a project under Market Sector A? Does the agreement need to have a minimum term?

Yes, an agreement that demonstrates 100% of the power or net metering credits from the PV system are being sold to an entity that qualifies as low or moderate income housing would be sufficient documentation to qualify a project under Market Sector A. The agreement must have a term of at least 10 years so that it coincides with the time period that the facility would be generating SREC IIs. In the case of a net metering credit purchase arrangement, the agreement will also need to be supported with a copy of the Schedule Z that clearly demonstrates 100% of the credits are being allocated to low or moderate income housing once interconnected.

11. Is there any potential risk that a project's SREC Factor could change once it has been assigned?

Pursuant to 225 CMR 14.05(9)(l)4, "the SREC Factor assigned to a Unit in its Statement of Qualification shall remain its SREC Factor for its entire 40 quarters of eligible generation of Solar Carve-out II Renewable Generation Attributes."