Creating A Clean, Affordable, and Resilient Energy Future For the Commonwealth



Massachusetts Department of Energy Resources

#### **COMMONWEALTH OF MASSACHUSETTS**

Charles D. Baker, Governor Karyn E. Polito, Lt. Governor Matthew A. Beaton, Secretary Judith Judson, Commissioner

### Solar Massachusetts Renewable Target (SMART): Informational Webinar for Public Entities



PUBLIC LEADERSHIP, STEWARDSHIP, COMMITTMEN



DEPARTMENT OF ENERGY RESOURCES

March 24, 2017

11 am

### Agenda

#### **Welcome and Introduction**

Leading by Example Program Eric Friedman Director, Leading by Example

Green Communities Program Deputy

Joanne Bissetta Deputy Directory, Green Communities

SMART Program Design SREC II Extension Q&A

Kaitlin Kelly Solar Program Manager



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# **Recording and Presentation**

- This webinar is being recorded and will be available on our website in approximately 48 hours at: <u>http://www.mass.gov/eea/energy-utilities-clean-</u> <u>tech/webinar-future-and-archive.html</u>
- Click on the camera icon top right of your screen to save any slides for future reference
- Use the Q & A icon on your screen to type in questions
- The slide presentation will also be posted



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## Leading by Example Program

### Targets by 2020

- 30% Renewable energy
- 40% GHG emissions reduction

### Scope

- Executive Agencies
- 29 Public Colleges & Universities
- Quasi Public Authorities
- 80 million SF of buildings
- 3,000 vehicles
- Emit 1 million+ tons GHG

#### Role

- Data collection analysis
- Technical assistance
- Grants and Financing
- Innovative technologies
- Communications & outreach



#### LEADING BY EXAMPLE: TOWARDS OUR TARGETS





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### **Solar Progress at State Facilities**



# **Green Communities Division**

The energy hub for **all** Massachusetts cities and towns, not just designated "Green Communities."



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## Green Communities Division: Programs & Resources for Municipalities

- Green Communities Designation and Grant Program
- MassEnergyInsight energy tracking and analysis tool
- Municipal Energy Technical Assistance
- Energy Management Services Procurement Oversight
- Website filled with tools & resources: <u>www.mass.gov/energy/greencommunities</u>

Email updates via e-blasts – Sign up by sending an email to: join-ene-greencommunities@listserv.state.ma.us



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# **Outreach - Regional Coordinators**

- Regional Coordinators act as direct liaisons with cities and towns on energy efficiency and renewable energy activities
- Located at each of the DEP Regional Offices:



WERO – SPRINGFIELD: Jim Barry Jim.Barry@state.ma.us



NERO – WILMINGTON: Joanne Bissetta Joanne.Bissetta@state.ma.us



CERO – WORCESTER: Kelly Brown Kelly.Brown@state.ma.us



SERO – LAKEVILLE: Seth Pickering Seth.Pickering@state.ma.us



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## Solar Massachusetts Renewable Target (SMART)



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### **SMART:**

#### A long-term, stable and sustainable solar program for the Commonwealth

**Basic Features:** 

- 1,600 MW AC declining block program
- Applies to all investor owned electric distribution companies
- Does not apply to MLPs
- Same compensation rates across state
- Base compensation rates and fixed price term set according to project size
  - > 10 year term for small projects; 20-year term for large projects
- Compensation structure differentiated between sized-to-load and standalone systems
- Adders based on location, and those that provide unique benefits, including community solar, low-income, public, and energy storage projects
- Base compensation rates decline by set percentages in each block following Block 1
- Maximum project size of 5 MW per parcel



#### Illustrative Declining Block Model



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## **SRECs vs. SMART**

#### <u>SREC</u>

- SRECs are a tradable commodity with a value that fluctuates based on market conditions:
  - Long-term revenue uncertainty leads to higher financing costs,
  - A large portion of the program costs are going to a 3<sup>rd</sup> party to pay for financing,
  - Total program costs and ratepayer impacts are difficult to predict.
- SRECs are an additional revenue stream independent of the value of the energy.



#### Declining Block Program

- Program provides long-term revenue certainty (10-20 years)
  which reduces financing risks and in turn, lowers soft costs
  - Total program costs can be predicted with certainty.
  - Incentive declines with the declining cost of solar.
- A solar facility receives a single compensation rate that accounts for both the energy and the incentive.
  - The resulting value of the incentive is the net difference between the all in rate and the value of the energy.

#### Example of the incentive level in the new program





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#### Example of the incentive level in a SREC program

# **Additional Program Features**

- Initial compensation rates will be set via a competitive procurement for larger projects (> 1 MW)
  - Procurement will determine capacity based compensation for projects > 1 MW
  - Indices will be used to set capacity based compensation for projects <= 1 MW</p>
- Projects eligible for the incentive may elect to receive compensation for energy through one of three mechanisms:
  - 1. Net metering
  - 2. Qualifying via additional on-bill crediting mechanism
  - 3. Buy-all, sell-all rate for standalone facilities that do not seek qualification under net metering or additional
- On-bill crediting mechanism is a new option that is intended to be an additional option to net metering



# **Additional Program Features**

- Standalone and Behind-the-Meter systems will have their incentives calculated using different methodologies
- New program will do more to steer projects towards optimal locations by providing location based incentives
  - Greenfield "subtractor" will be applied to the compensation rate of any facility sited on open space that does not meet the criteria to receive the full incentive
- Energy storage will be compensated via variable adder that is based on the ratio of storage capacity to solar capacity as well as the duration of the storage
  - Minimum performance standards will apply to ensure grid benefits are realized



# **Project Categories**

- Incentive values primarily based on project size:
  - > Rates set based on index following initial procurement
    - Less than 25 kW AC (Low Income)
    - Less than 25 kW AC
    - 25 250 kW AC
    - 250 500 kW AC
    - 500 kW AC 1,000 kW AC
  - > Competitively Set Rates for Block 1, with fixed percentage declines thereafter
    - 1,000 2,000 kW AC
    - 2,000 5,000 kW AC
- Adders for different project types:
  - Location Based:
    - Brownfields
    - Building Mounted
    - Landfills
    - Solar Canopies
  - > Off-taker Based:
    - Community Shared Solar (CSS)
    - Low Income CSS
    - Low Income Property
    - Public
  - Solar + Storage
- Adders can be aggregated
- All capacity based rates and adders will decrease by 4% per block



# **Initial Competitive Procurement**

- Program will commence w/a competitive procurement seeking 100 MW of projects > 1 MW each
- DOER will establish two ceiling prices:
  - > A \$0.15/kWh price for projects sized between 1 and 2 MW; and
  - > A \$0.14/kWh price for projects sized larger than 2 MW
- A clearing price for each subcategory will be established, which shall be equal to the highest requested capacity based compensation rate requested among the selected proposals
- Indices will be used to establish the capacity based compensation rates for all other project size categories in Block 1 and will be based on the clearing price for projects between 1 and 2 MW
- Projects larger than 1 MW not selected through the procurement process will immediately fall under Block 2, for which the capacity based compensation rate shall be 4% less than the clearing price

Capacity Based Compensation Rates for Solar Generation Units <= 1 MW AC					
Generation Unit Capacity (kW AC)	Capacity Based Rate Factor (% of Clearing Price)	Term Length			
Low income less than or equal to 25 kW AC <sup>1</sup>	230%	10-year			
Less than or equal to 25 kW AC	200%	10-year			
Greater than 25 kW AC to 250 kW AC	150%	20-year			
Greater than 250 kW AC to 500 kW AC	125%	20-year			
Greater than 500 kW AC to 1,000 kW AC	110%	20-year			
Greater than 1,000 kW AC to 2,000 kW AC	100%	20-year			
Greater than 2,000 kW AC to 5,000 kW AC	TBD	20-year			

1. Must be an R-2 customer to qualify

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## Example: How Indices will be Used to set Rates for Different Project Types

• If clearing price of competitive procurement is \$0.15/kWh the following will be the Capacity Based Compensation Rates for Block 1

Capacity Based Compensation Rates (kW AC)						
Generation Unit Capacity	Capacity Based Rate Factor (% of Clearing Price)	Capacity Based Rate (\$/kWh)	Term Length			
Low income less than or equal to 25 kW AC	230%	\$0.3450	10-year			
Less than or equal to 25 kW AC	200%	\$0.3000	10-year			
Greater than 25 kW AC to 250 kW AC	150%	\$0.2250	20-year			
Greater than 250 kW AC to 500 kW AC	125%	\$0.1875	20-year			
Greater than 500 kW AC to 1,000 kW AC	110%	\$0.1650	20-year			
Greater than 1,000 kW AC to 2,000 kW AC	100%	\$0.1500	20-year			
Greater than 2,000 kW AC to 5,000 kW AC	TBD	<=\$0.1400	20-year			



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## **Adder Values**

All adder values will decline by 4% per capacity block

Location Based Adders				
Туре	Adder Value (\$/kWh)			
Building Mounted	\$0.02			
Brownfield	\$0.03			
Landfill	\$0.04			
Solar Canopy	\$0.06			

Off-taker Based Adders					
Туре	Adder Value (\$/kWh)				
Public Entity	\$0.02				
Community Shared Solar (CSS)	\$0.05				
Low Income Property Owner	\$0.03				
Low Income CSS <sup>1</sup>	\$0.06				

Solar + Energy Storage				
Туре	Adder Value (\$/kWh)			
Storage + PV	Variable			

1. Must be at least 50% R-2 customers



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# **Standalone vs. Behind-the-Meter**

- **Standalone facilities**: defined as facilities with no associated load other than parasitic or station load
  - Value of the incentive will change over time as energy value increases or decreases
    - If standalone facility is net metered or approved under a similar DPU structure, incentive calculated by subtracting the value of the energy it generates from its all-in compensation rate
    - If standalone facility is not net metered or approved under a similar DPU structure, facility will receive a single payment from the utility equal to its all-in compensation rate (provides bundled compensation for energy, capacity, and incentive)
- **Behind-the-meter facilities**: any facility that does not meet the definition of standalone
  - Value of incentive will be fixed and is determined at the time it is interconnected



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# **Behind-the-Meter Incentive Calculation**

Behind the Meter Solar Tariff Generation Unit Compensation Rate

- = (Capacity Based Rate + Adders)
- (Three year average of Volumetric Delivery Rates
- + Three year average of Basic Service Rate)

### • Example:

- A 10 kW facility qualifies under Block 1 at a \$0.30/kWh all-in compensation rate
- Project is interconnected behind a meter on the R-1 rate class
- The volumetric distribution + transmission + transition + 3-year average basic service rate for this particular rate class is \$0.18/kWh
- The incentive rate would be set at \$0.12/kWh and would remain in effect for 10 years, regardless of what happens to energy values



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# **Example: Solar Canopy (Public)**

**Example:** 2 MW solar canopy at public higher education campus with onsite consumption

- Project qualifies under Block 1 at a <u>\$0.15/kWh</u> base rate
  - Public adder <u>\$0.02/kWh</u>
  - Solar canopy adder <u>\$0.06/kWh</u>
- Total all-in compensation rate: <u>\$0.23/kWh</u>
- Project interconnects behind the meter at facility's rate class
- Assume: volumetric distribution + transmission + transition + 3-year average basic service rate for this particular rate class is <u>\$0.14/kWh</u>

The incentive rate would be set at \$0.09/kWh and would remain in effect for 20 years, regardless of what happens to energy values



# Example: Landfill Solar (Public)

**Example:** 2 MW ground-mounted solar installation on public landfill with no associated onsite consumption

- Project qualifies under Block 1 at a <u>\$0.15/kWh</u> base rate
  - Public adder <u>\$0.02/kWh</u>
  - Landfill adder <u>\$0.04/kWh</u>
- Total all-in compensation rate: <u>\$0.21/kWh</u>
- Project approved for standalone on-bill crediting
- The compensation rate would be set at \$0.21/kWh, you would receive that rate for 20 years, as a changing combination of on bill credits and incentive payments



## **Standalone Generator Example**



Note: Graph is illustrative of how payments would be determined and does not reflect projected values

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■ Energy (\$/kWh) ■ Incentive (\$/kWh)

Note: Graph is illustrative of how payments would be determined and does not reflect projected values



# **Solar Program Administrator**

- The solar program administrator will be responsible for:
  - Reviewing applications, qualifying facilities, and managing block reservations
  - Determining the total amount to be paid/credited to the facility owner and off-takers every month
  - Issuing incentive payments to owners on behalf of the distribution companies
  - Acting as NEPOOL GIS independent verifier for all eligible systems



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# Land Use

- Ground mounted projects that are larger than 500 kW, not sited on a brownfield or landfill, and are on land that has not been previously developed, will be subject to a \$/kWh "subtractor" that changes based on the number of acres impacted
- All ground mounted projects will also be subject to a set of performance standards developed in consultation with the Department of Agricultural Resources

Project Type	Ground Mounted and not C&I Zoned	Ground Mounted, C&I Zoned, and NOT Previously Developed	Ground Mounted, C&I Zoned, and Previously Developed	Rooftop	Brownfields	Landfill	Parking Lot Canopy
Compensation Rate (\$/kWh)	X - \$0.001/acre	X - \$0.0005/acre	X	X + \$0.02	X + \$0.03	X + \$0.04	X + \$0.06
▲ Reducers Base Rate Adders Adders ♦ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■ ■							



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# **Additional On-bill Crediting Option**

- The vast majority of solar facilities today are compensated for energy via net metering
- On-bill Crediting offered as alternative to net metering
- Will function similarly to net metering, but only available to participants in the new incentive program
- Not part of DOER regulation, but would be established via a DPU approved process that would be filed by the distribution companies in conjunction with or in parallel to the filing for the incentive program
- Compensation rate for exported energy would likely be set at basic service rate



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# **Benefits of Additional On-bill Credit**

- Single rate for all facilities
- Allows for credits to be transferred to off-takers without net metering
- No cap
- No "single parcel" rule
- No 10 MW public entity cap
- Cap on number of credits that can be transferred to a off-taker (based on off-taker's kWh consumption)
- Potential for fewer limitations on the number of times off-takers can be changed or re-allocated within a year
- Opportunity to streamline administrative aspects of credit transfers through software solutions



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# **System Type Definitions**

- Definitions for Landfills, Brownfields, Building Mounted, and Low Income Properties will remain largely unchanged from SREC II
- Definition for Solar Canopies will be slightly modified
- New definitions will be added for:
  - Low Income Residential
  - Low Income Community Shared Solar
  - Public Facilities
  - Energy Storage



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# **Solar Canopies**

• Solar Canopy definition from 225 CMR 14.02 will be modified slightly as follows:

<u>Solar Canopy Generation Unit</u>. A solar photovoltaic Generation Unit with at least 100% of the nameplate capacity of the solar modules used for generating power installed on top of a parking surface, pedestrian walkway, agricultural land, or canal in a manner that maintains the function of the area beneath the canopy.

- New definition allows for canopies to be installed on agricultural land and over canals
- Eligibility of canopies sited on agricultural land will be determined in consultation with Massachusetts Department of Agricultural Resources.



## **Low Income**

- DOER intends to maintain SREC II criteria and Guideline for qualifying facilities that serve low income properties
- New program will provide additional support for projects directly serving low income residents in two ways:
  - Projects <=25 kW that serve R-2 utility customers will be eligible for a higher incentive rate
  - Community Shared Solar projects with at least 50% of off-takers on an R-2 rate will receive a higher level incentive than normal CSS projects



# **Public Facilities**

• The definition of Public Entity Generation Unit will be established as follows:

<u>Public Entity Generation Unit</u>. A solar photovoltaic Generation Unit sited on property owned by a Municipality or Other Governmental Entity that is either:

- (a) owned or operated by a Municipality or Other Governmental Entity; or
- *(b) has assigned 100% of its output to Municipalities or Other Governmental Entities.*
- Definition tracks closely with the definition of a Net Metering Facility of a Municipality or Other Governmental Entity from net metering regulation, but differs in that it requires facilities to be sited on property owned by a Municipality or Other Governmental Entity



# **Energy Storage**

- Single adder category for all energy storage that meets certain eligibility requirements
- Adder will be variable, based on ratio of storage capacity to solar capacity, as well as the duration of the storage
  - Formula designed to provide more value to higher capacity and longer duration storage
- Base adder of \$0.045/kWh
- Adder will decrease by 4% per block
- Facilities smaller than 25 kW will also be able to receive a storage adder
- If DOER amends APS regulation to include storage:
  - Projects receiving energy storage adder that also generate Alternative Energy Certificates (AECs): AECs will be transferred to the distribution companies for APS compliance



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# **Energy Storage Adder Benefits**

- Pairing solar with storage provides many benefits to the electric grid:
  - Improves power quality support (e.g. cloud induced voltage flicker support)
  - Allows for rapid ramping to reduce intermittency of solar
  - Allows for energy generation to be shifted to reduce peak demand
  - Reduces strain on distribution system during times of minimum load and high PV output
- Adder is structured to realize these benefits in ways that are consistent with DOER's State of Charge report
- Adder provides greater value to projects with higher storage capacity and longer duration



# **Energy Storage Adder Matrix**

	Storage Hours @ Rated Capacity								
	Minimum								Maximum
Storage kW as % of Solar	2	2.5	3	3.5	4	4.5	5	5.5	6
25%	\$0.0247	\$0.0271	\$0.0291	\$0.0307	\$0.0321	\$0.0334	\$0.0345	\$0.0356	\$0.0365
30%	\$0.0321	\$0.0352	\$0.0377	\$0.0399	\$0.0418	\$0.0434	\$0.0449	\$0.0462	\$0.0474
35%	\$0.0382	\$0.0419	\$0.0450	\$0.0476	\$0.0498	\$0.0517	\$0.0535	\$0.0551	\$0.0565
40%	\$0.0428	\$0.0470	\$0.0504	\$0.0533	\$0.0558	\$0.0579	\$0.0599	\$0.0617	\$0.0633
45%	\$0.0460	\$0.0504	\$0.0541	\$0.0572	\$0.0599	\$0.0622	\$0.0643	\$0.0663	\$0.0680
50%	\$0.0481	\$0.0527	\$0.0565	\$0.0598	\$0.0626	\$0.0650	\$0.0673	\$0.0692	\$0.0711
55%	\$0.0494	\$0.0542	\$0.0581	\$0.0614	\$0.0643	\$0.0668	\$0.0691	\$0.0712	\$0.0730
60%	\$0.0502	\$0.0551	\$0.0591	\$0.0625	\$0.0654	\$0.0680	\$0.0703	\$0.0724	\$0.0743
65%	\$0.0507	\$0.0557	\$0.0597	\$0.0631	\$0.0661	\$0.0687	\$0.0710	\$0.0731	\$0.0750
70%	\$0.0511	\$0.0560	\$0.0601	\$0.0635	\$0.0665	\$0.0691	\$0.0715	\$0.0736	\$0.0755
75%	\$0.0513	\$0.0562	\$0.0603	\$0.0638	\$0.0667	\$0.0694	\$0.0717	\$0.0739	\$0.0758
80%	\$0.0514	\$0.0564	\$0.0605	\$0.0639	\$0.0669	\$0.0696	\$0.0719	\$0.0740	\$0.0760
85%	\$0.0515	\$0.0565	\$0.0606	\$0.0640	\$0.0670	\$0.0697	\$0.0720	\$0.0742	\$0.0761
90%	\$0.0515	\$0.0565	\$0.0606	\$0.0641	\$0.0671	\$0.0697	\$0.0721	\$0.0742	\$0.0762
95%	\$0.0515	\$0.0566	\$0.0607	\$0.0641	\$0.0671	\$0.0698	\$0.0721	\$0.0743	\$0.0762
100%	\$0.0516	\$0.0566	\$0.0607	\$0.0641	\$0.0671	\$0.0698	\$0.0722	\$0.0743	\$0.0763

Reflects value for year 1 projects based on size & duration



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# **SMART Program Details**

#### **Qualification Process**

- All projects must submit an application to the Solar Program Administrator
- If before interconnection, additional documentation needed to reserve spot:
  - ➤ A project ≤ 25 kW: executed turnkey contract between the installer and customer
  - A project >25 kW: executed interconnection service agreement (ISA), proof of site control and all non-ministerial permits
- Must submit a copy of authorization to interconnect by end of reservation period to remain qualified and begin receiving compensation

### **Block Reservations and Management**

- Provided on first-come, first-served basis
- Incomplete applications can hold position for some time to resolve deficiencies
- Initial reservation period is 12 months (may be extended for certain circumstances)
- If project does not meet deadlines, reserved capacity added to block currently open
- Projects that trigger a new block will receive a blended rate

**Example:** 1 MW project has 500 kW under Block 1 at a rate of \$0.20/kWh and 500 kW under Block 2 at a rate of \$0.19/kWh. Its all-in compensation rate would be set at \$0.195/kWh.



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# **SMART Program Details (Cont.)**

#### **Metering and Reporting**

- Two separate meters: utility customer meter and production meter
- Distribution company owns production meter and reports both production and utility meter data to program administrator on monthly basis
- Technical requirements for meters TBD (will likely mirror existing standards)
- Process to be established to ensure production meter data can be accessed by system owner (or, may choose to own redundant production meter)
- Data Acquisition System (DAS) may be required for all systems

### **Billing/Crediting**

- Program administrator will:
  - 1. Collect metered data from distribution company to calculate:
    - Amount of incentive payments owed to system owner
    - Any credits to be applied to off-takers bills
  - 2. Invoice distribution companies and make incentive payments to system owners
  - 3. Notify distribution company of credits that need to be applied to offtaker accounts



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# **Class I REC Ownership**

- Ownership rights to Class I RECs generated by a facility will be automatically transferred to distribution company
  - Distribution company retains ownership of Class I RECs for as long as facility is eligible to receive payments
  - Following a project's eligibility period, ownership rights of RECs revert to owner of facility
- Each distribution company will be required to establish and maintain a generator account at the NEPOOL GIS and register individual facilities as assets within that account



# **Municipal Light Plants (MLPs)**

- DOER has had several meetings with MLP operators and their associations since releasing its straw proposal in September
- Several productive meetings have led to an interest in working with the administration to create a framework for voluntary MLP solar program
- DOER will provide more information as soon as it becomes available



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# **Program Implementation**

- Implementing new program requires DOER rulemaking and DPU proceeding
- DOER to file emergency regulation soon
- Rulemaking to establish permanent regulation must conclude within 90 days
  - Public hearing(s) and comment period will occur in this window
- In parallel with rulemaking, distribution companies jointly:
  - Issue RFP for Solar Program Administrator
  - Issue RFP for 100 MW
  - File for approval of program and cost recovery from DPU
- Filing at DPU begins DPU proceeding, schedule to be established by DPU
- Program effective upon DPU approval



# **Anticipated Timeline**

- January 2017: DOER releases final program design
- April 2017:
  - > DOER files emergency regulation
  - Public hearing and comment period on regulation
- July 2017: DOER promulgates final regulation
- August 2017:
  - Distribution companies file with DPU, issue RFP for Block 1 procurement, and issue RFP for Solar Program Administrator

#### • September 2017:

- Competitive procurement results announced, compensation rates established
- Solar Program Administrator selected
- Winter/Spring 2018:
  - > DPU approves distribution company filing
  - Program goes into effect





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# **SREC II Transition**

- Deadline for SREC II eligible projects > 25 kW DC seeking an extension through May 8, 2017 has now passed
- To eliminate gap between programs, new extensions for good cause will be granted to any facility that has not already secured an extension
  - Construction deadline for all facilities extended to March 31, 2018
  - To secure extension, project owners must submit a Statement of Qualification application and Good Cause Extension form provided on DOER website
    - Extension for good cause granted at <u>further reduced SREC factor</u>
    - SREC Factor Guideline updated to reflect these changes

Market Sector	SREC Factor
А	0.7
В	0.6
С	0.55
Managed Growth	0.5



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# **Additional Resources**

#### **SMART Materials**

- To access this presentation and the audio recording of the webinar: <u>http://www.mass.gov/eea/energy-utilities-clean-tech/webinar-future-and-archive.html</u>
- To access recording or full version of the original SMART presentation: <u>http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/rps-aps/development-of-the-next-solar-incentive.html</u>
- Stay tuned for public hearing(s) and written comment period, to be announced when regulation is filed

#### **SREC II Materials**

- SREC II Factor Guideline: http://www.mass.gov/eea/docs/doer/rps/225-cmr-14-solar-guideline.pdf
- SREC II Extension Statement of Qualification Application: <u>http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/solar/rps-solar-carve-out-</u> <u>2/sqa-solar-carve-out-ii.html</u>
- Current Status of SREC II and Good Cause Extension Form: <u>http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/solar/rps-solar-carve-out-</u> <u>2/current-statis-solar-carve-out-ii.html</u>



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## Thank you! Q& A

