



Massachusetts Solar Owners Association

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February 25, 2015

Dear Co-Chairs Commissioner Burgess and Commissioner O'Conner and Members of the Net Metering and Solar Task Force:

Thank you for the opportunity to comment on your consultant's presentations given to date as the Task Force begins the process of developing future solar policy for our state. The Massachusetts Solar Owners Association (MASOA) is a non-profit organization of residential and commercial solar owners in Massachusetts. MASOA is committed to supporting solar energy in Massachusetts as a vital tool for the Commonwealth to meet the legal mandates of the Global Warming Solutions Act (GWSA) of 2008 and the roadmap laid out by the Massachusetts Clean Energy and Climate Plan for 2020.

What are the future Massachusetts Solar Energy Goals? No doubt you are familiar with the old saying about putting the cart before the horse, and in this case regarding future Massachusetts solar policy it appears that the Task Force has employed consultants to propose seven future "Plans" before establishing solar energy goals – at least not publicly. Would it not make sense prior to proposing future solar policy to first have agreed to short term and long-term solar energy milestones, and then set the course via new solar policy and legislation to achieve these goals?

MASOA is not the first to present this idea. MASOA, as a member of Mass Solar Group, fully supports the response submitted to the Task Force Plans on February 20th by Fred Ugner, titled "Fair Solar Policy Framework" and signed by numerous other solar stakeholders and environmental organizations. MASOA also fully supports the suggested solar energy goals submitted by on February 23rd by Berkshire Environmental Action Team (BEAT), and would like to reaffirm and add the following:

- **Lift the cap on solar net metering now.** Raising the caps will remove the primary barrier to the continued success of solar in the Commonwealth. Removing the net metering cap will also lift the need for a March deadline on solar policy, allowing the Task Force time to properly set long and short term goals and achievable carefully crafted legislation.
- **Begin to determine long-term goals first.** Why not start with goal #1: Massachusetts will have 100% renewable generated electric energy no later than 2050. Goal #2: a minimum of 25% of our electric generation will come from solar by 2025. Goal #3: a minimum of 10% of our electric generation will come from solar by 2018. Just as President Kennedy set inspired goals for the US to reach the moon by 1969, the Task Force can layout the necessary timeline, policies and incentives to achieve these solar generation goals for the future.
- **Go beyond the ideas of H4185.** Current guidelines for Task Force legislation only suggest that certain portions of H4185 be reviewed and considered, therefore if proposals such as changes to virtual net metering or creating a minimum bill will conflict with the continued growth of solar PV investment they should be discarded

in favor of policies that will continue solar growth. The major failing of H4185 was that while it appeared to release solar PV from the yoke of limited net metering, it did so by limiting solar growth, connectivity, incentives, and forcing solar PV to conform to a 100+ year-old utility business and operating model that no longer works today.

- **Learn from history.** When it comes to increasing solar PV, our state was very slow to get started. From 2005 to 2009 the Commonwealth Solar programs had rules that changed every six months, very limited incentives and RECs that never appreciated in value as promised. Change came with the 2008 Green Community Act and solar PV finally got fairly compensated net metering. In 2010 the SREC program changed everything, encouraging growth both small and large in scale, making solar a viable investment and creating thousands of jobs. SRECII has both managed solar growth and has helped stabilize the SREC value. There is little question that solar PV growth has also lowered the cost of equipment, and begun to make community solar projects available to those 80% of Massachusetts residents for whom solar ownership is not possible on their properties. Why would we not want this progress to continue?

With a little over a month to go ... we find unfortunately, six of the seven consultant proposals appear to want to intentionally slow or reverse the solar progress we have made, they are simply six different ways to repackage the same ideas found in H4185, and the seventh “plan” is basically status quo except to increase SRECs for an extra five years, but strip away the ACP funds that have backed up the last two SREC auctions and give the money back to ratepayers. To sum these “plans” up, none of them are designed to increase solar PV growth, worse still the plans don’t foresee solar as a replacement for fossil energy. Instead it can only be concluded that solar PV is viewed by the Task Force as an unwanted but necessary burden to the utilities rather than a viable energy alternative. Solar PV is the “square peg” that will never fit the hole left by closed nuclear, oil and coal fired power plants for the utilities who instead plan to rely on natural gas, another finite fossil fuel for as long as possible no matter the cost to our planet and future existence.

Perhaps the best first step is for the Task Force to realistically determine the full value of solar PV, before agreeing to goals and proposing policy. When we say value, we mean more than just how can solar compete in the energy marketplace. After all what is the real actual cost of a gas, oil or coal generated kilowatt when you factor the damage to our environment, our health, and war? Twice or three times what we are billed for by our utility, with the difference to be paid with the poisoning of our air and water, destruction of forests and wildlife habitats, and uncertain changes to our climate.

As individuals most of us feel there is little we are able to do to change the course of our energy future, but for members of MASOA, solar PV is proof that as individuals we can make an important difference. However few of us could have invested in solar without the help of federal and state incentives. This is also true today and will be for many future new solar owners. So the question and the important goal remains, and it is not “can we continue to afford growing solar in Massachusetts,” but rather “how can we afford to NOT grow solar in Massachusetts?”

Sincerely from the MASOA Board,

Christopher Smith, *Chair/Secretary*