



Massachusetts Solar Owners Association

HTTP://www.MASOA.org -- info@MASOA.org
19 Prospect St. • Hatfield, MA 01038 • 413-247-5362

July 14, 2017

Mark D. Martini, Secretary
Department of Public Works
One South Station
Boston, MA 02110

RE: D.P.U. 16-64-F (As Well As 16-64 Generally)

Dear Hearing Officer Staci Rubin and Department Officers:

Kindly accept our organization's response to the DPU implementation of the Minimum Monthly Reliability Contribution (MMRC) fee for which you are receiving proposals from the state utilities.

While we have responded to the questions set out in 16-64-F below, we ask that DPU delay any implementation of MRCC for installed solar net metered production until 2020, as provided in Chapter 75 of the Acts of 2016.

We share many, if not all, the concerns raised by those opposing the utilities' proposals for application for this fee. But we also believe the MMRC discriminates against solar and other renewable energy production as it will deter and inhibit growth and punish investors. Absent a delay in implementation, we, and other renewable investors, anticipate seeking further administrative and judicial review, as well as any necessary amendments to, or repeal of, the law.

Our responses to the questions posed are as follows:

#1 Solar 1600 MW threshold should be calculated as "AC" because that is how electricity is sold and distributed;

#2 Solar 1600 MW threshold should be calculated based solely on the total of actual net metered accounts in investor-owned utilities;

#3 Solar 1600 MW threshold should be calculated based solely on actual number of constructed and interconnected net metered accounts.

Sincerely,

Christopher Smith, Secretary/Chair, www.MASOA.org
19 Prospect Street, Hatfield, MA 01038 413-247-5362