



February 17, 2015

Delivered via e-mail to DOER.SREC@state.ma.us

Dwayne Breger, Ph.D.
Director, Renewable and Alternative Energy Development
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, Massachusetts 02114

RE: Low or Moderate Income Housing Generation Units Guideline

Dear Dr. Breger:

The Massachusetts Association of Community Development Corporations (MACDC) would like to offer the following in response to the Department of Energy Resources (“DOER”) request for comments on the draft Low or Moderate Income Housing Generation Units Guideline (“Guideline”) posted on DOER’s website on February 6, 2015.

MACDC is an association of mission-driven community development organizations dedicated to working together and with others to create places of opportunity where people of diverse incomes and backgrounds access housing that is affordable, benefit from economic opportunities, and fully participate in the civic life of their community. We achieve this by building and supporting a high performing and adaptive community development sector that is supported by private and public investment and sound public policies. Founded in 1982, MACDC currently has 88 members, including 60 CDC members and 28 associate members.

MACDC supports the Guideline as drafted. It provides solar developers with the guidance and certainty needed to successfully develop solar projects that serve public and private affordable housing developments. In particular, the pre-determination mechanism affords an important pre-development level of assurance that a project will qualify for Market Sector A and help solar developers secure financing for their projects. At the same time, the draft Guideline is flexible enough to ensure that solar projects are able to serve private affordable housing developments irrespective of their particular ownership structure, how they were financed or who manages them.

MACDC has one suggestion for how DOER could improve the draft Guideline. In its current form, the draft Guideline does not explicitly state that solar projects serving residents of public and private affordable housing developments could qualify for market Sector A. As MACDC understands, however, it is DOER’s intent that such projects would be eligible. To make that intent clear, we suggest a couple of minor modifications to Section 2 of the draft Guideline:

1. Modify the title of Section 2 by adding “or its residents” so that the section title reads: “Proof that 100% of Output is Delivered to Low or Moderate Income Housing or its residents.”

2. In the first paragraph of Section 2, add “or the residents of low or moderate income housing.” to the end of the first sentence in the first paragraph so that it reads: “In order to obtain a Statement of Qualification, an applicant must demonstrate that the Generation Unit will deliver 100% of its output in the form of electricity or net metering credits to the low or moderate income housing or the residents of low or moderate income housing.”

Thank you for your consideration of our comments. If you need additional information, feel free to contact me at 617-379-5922, or at joek@macdc.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Kriesberg". The signature is written in a cursive style with a large, sweeping flourish at the end.

Joe Kriesberg, President and CEO