



## Chase Systems LLC

Renewable Energy Development and Consulting

Department of Energy Resources  
100 Cambridge St.  
Suite 1020  
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Attention: Michael Judge  
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[DOER.SREC@state.ma.us](mailto:DOER.SREC@state.ma.us)

3/24/13

Subject: Comments on Post 400 MW solar incentive program

Dear Mr. Judge:

Today we have significant success to celebrate, and the opportunity to reach higher. We are installing 400 MW of distributed PV generation capacity well ahead of the original schedule. As many know the value of which significantly exceed the simple value of the electricity generated when compared with that generated from other sources.

We have the opportunity to improve on the program by:

- Provide a clear, simple, bankable revenue stream. Encouraging local individual and bank investment.
- Simplify the complex set of rules and procedures to derive revenue, reducing complexity, uncertainty and delays.
- Expand the financing opportunities for small to medium (less than 250 kW) size systems, which are frequently passed over due to the soft costs and complexity of the implementation process.
- Broaden the opportunity for residential, municipal and non-profit organizations to invest in and be system owners. Those who are unable to utilize the Investment Tax Credit and Depreciation.
- Providing a stable long term program. Avoid causing major speedup and slowdowns in project cycles. This improves project planning and management, reducing complexity and cost.
- Continue to lower the cost curve, bringing costs to grid parity

We are now at a point where we can address the above and learn from the programs which have been implemented throughout the US and around the world.

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Many programs in the US and around the world have used variations of Feed-in Tariffs to provide incentives with good result. We have seen a number of unintended consequences, which have been addressed as later programs learn from the earlier.

I refer you to the NREL publication "A policymaker's Guide to Feed-in Tariffs". A thorough review of the world wide implementations with analysis and recommendations of best practices.

Thank you for your consideration. I strongly encourage this proven method be used for project incentives in Massachusetts beyond the 400 MW cap! I am happy to chat more about my experiences and thoughts on how to improve the program.

Sincerely,

Richard Chase  
Principal, Chase Systems

**Background:**

Chase Systems a solar energy consultancy based in Massachusetts, has participated in the completion of over 2 MW of solar projects, with over 8 MW under construction and more than 10 MW additional projects in the pipeline.

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