

LINCOLN-SUDBURY REGIONAL SCHOOL DISTRICT
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Mark Sylvia
Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: Pending Statement of Qualification Application (SQA) for SRECs for proposed solar energy project at the Lincoln-Sudbury Regional High School

Dear Commissioner Sylvia:

I am writing to you as chair of the Lincoln-Sudbury Regional School Committee on behalf of Lincoln-Sudbury Regional High School, located in Sudbury, Massachusetts. An SQA for a large solar project to be constructed on a canopy over the school's parking area has recently been submitted to the Department of Energy Resources (DOER) by the project developer, SunEdison LLC.

As background, our high school was built in 2004 with an energy efficient heat pump system that recirculates heated air as needed. For cost savings and efficiency, the system has been constantly updated to allow the District to be as green as possible. The facilities staff and teaching faculty continue to seek ways to improve energy efficiency and promote conservation efforts. Because of our green efforts, Senator Jamie Eldridge successfully nominated the District for the 2013 "Making a Green Difference" Award. The planned solar parking canopy was cited as crowning achievement of our school's efforts.

The school roof could have been an attractive place for an array given relatively low cost and significant surface area, as well as a minimal need for costs to be defrayed through the first round of SREC incentives. Due to the building's roof design and applicable building regulations, we concluded, however, that a roof array is not possible. Therefore, we have been working closely with Power Options and SunEdison since February 2012 to design a solar array affixed to a canopy over the parking area. The resulting proposed project is designed to produce 1.26 Megawatts, which will meet an estimated 50% of the school's annual electric power requirements, with the canopy designed to cover approximately 80% of the main parking lot. The Towns of Lincoln and Sudbury enthusiastically expressed their full support for the project at their spring 2013 town meetings. Attached is a drawing of the proposed canopy.

SunEdison filed an SQA with the DOER on 5/31/13 for SRECs to be generated by this project during the first SREC application period. The canopy is an expensive undertaking for SunEdison, given the steel structure and the magnitude of the array. Thus, to be economically viable, the project needs the most favorable level of incentives under the current or a future SREC program. In the report from your June 7, 2013 stakeholder meeting, on page 21, DOER presents several categories of incentives with different SREC formulas for different types of solar arrays. We urge DOER, in designing a new SREC program, to classify projects such as ours for the more favorable incentive treatment that may be afforded projects in the landfill/brownfield category. Given the parking lot over which the array would be constructed already exists, our proposal really fits the "landfill/brownfield" site category best. We will be enhancing an existing space of impervious cover. The project would not claim new land in agriculture, forestry or with other environmentally important open space values for the construction of the array.

Our project may not meet the requirements for a finalized interconnection services agreement (ISA) to qualify for the first SREC program. The application for an ISA was filed with NSTAR prior to June 7, as was our application with the DOER, but we have not received a response from NSTAR. We also understand that while some current SQAs may simply be placeholders and will ultimately prove to be ineligible, DOER does not anticipate that enough SQAs will fall into this category to open up room in the first SREC program for projects such as ours that do not yet have an executed ISA.

SunEdison is continuing its work to ensure it is fully prepared to move forward pursuant to their contract with us, even if it means waiting until the finalization of the next SREC program to proceed. What we ask of the DOER is that our project, given its uniqueness, be given every consideration under the landfill/brownfield category in the next SREC program or, if possible, under the first SREC program.

What we have proposed is:

- an increased, positive land use which will reduce “hot spot” effect, the sun’s impact on the large asphalt parking lot,
- a high visibility, community supported, multi-benefit project, both insofar as immediate and direct green energy savings as well as green education for the District.

It is our hope that, as you finalize the incentive categories, you will put solar arrays covering existing “hot spots” in the same category as “brown fields”. It is our feeling that covering these types of areas has equivalent benefit to the environment as the repurposing of “brown fields”.

In addition, this project presents an opportunity for both towns, Lincoln and Sudbury, to witness the impact of this project that can be redeployed into the classroom. The project itself will be its own classroom for green energy education that will influence thousands of students and their families by being physically “right here” on campus. Our project will help fulfill DOER’s educational mission. We are planning to use a portion of the energy cost savings to create a student-centered course, modeled upon the program at Manchester Essex High School.

We ask for your thoughtful consideration and are available to answer any questions you may have.

Sincerely,

Radha Gargeya
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