



March 27, 2015

Connecticut Department of Energy and Environmental Protection
National Grid
NSTAR Electric Company
Western Massachusetts Electric Company
Unitil

Submitted via email: CleanEnergyRFP@gmail.com

RE: Comments of SunEdison on the Draft Request for Proposals for Clean Energy and Transmission

Dear Soliciting Parties:

The purpose of this letter is to provide the comments of SunEdison on the Draft Request for Proposals for Clean Energy and Transmission ("Draft RFP") issued on February 25, 2015. At the time of the issuance of the Draft RFP, the Connecticut Department of Energy and Environmental Protection, National Grid, NSTAR Electric Company, Western Massachusetts Electric Company, and Unitil (collectively, "Soliciting Parties") requested comments on the proposed RFP from all interested parties. Accordingly, we offer the following comments.

SunEdison manufactures solar technology and develops, finances, installs, owns, and operates wind and solar power plants, delivering predictably priced electricity to its residential, commercial, government, and utility customers across the globe. In New England, SunEdison has developed numerous small and distributed solar projects in Connecticut, Massachusetts, and Rhode Island (as well as elsewhere in the region), and operates six grid-scale wind facilities. The company currently has 610 megawatts (MW) of utility-scale solar and wind in operation or construction in the region.

Through its acquisition of First Wind earlier this year, SunEdison has experience with previous large-scale renewable energy solicitations run by the Soliciting Parties. In fact, SunEdison currently operates one wind facility and is building two more that have long-term Power Purchase Agreements (PPAs) obtained through previous solicitations involving several organizations within the Soliciting Parties group.

SunEdison believes that competitive long-term procurements, such as that which is outlined in the Draft RFP, can be very effective at both driving down costs for consumers and spurring more investment in clean and renewable power. This is supported by the experience of recent

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procurements by states and utilities around New England. Accordingly, we applaud the Soliciting Parties for initiating this process and encourage the timely issuance of a solicitation.

In general, SunEdison finds the draft RFP to be comparable to past successful solicitations, consistent with the authorizing statutes of the three states, and likely to meet its stated purpose. As a result, we do not have significant modifications to suggest and urge the Soliciting Parties to issue this spring a final RFP generally consistent with this draft. Nevertheless, we do make the following observations.

First, as noted above, recent competitive procurements by a number of the parties that are part of the Soliciting Parties group have been very successful in terms of obtaining PPAs that will provide significant benefits to New England consumers. These procurements have also have been important to facilitating the financing of renewable energy facilities. However, in a number of cases there has been significant attrition between the number of projects selected to receive PPAs and the number that actually execute PPAs and get built. While in some cases projects have dropped out due to differences over contract terms, a number of projects simply lacked viability to move forward to completion. While screening for project viability is an inexact science, and we note in the draft RFP the detailed list of project viability factors that will be assessed during the qualitative review process, we encourage the Soliciting Parties to give significant weight to the deliverability probability of bids. Another strategy to sort the viable projects from those that are unlikely to be built is to increase the amount of Development Period Security that developers will be required to post.

Second, we encourage further transparency regarding the quantitative evaluation criteria, particularly related to the basic parameters and assumptions behind the base case reference forecast, consultant, and methodology. We believe that bidders are most likely to be in a position to offer the best possible proposals at the most competitive pricing when the process provides at least a basic understanding of what bids are to be measured against.

In summary, SunEdison believes that the Draft RFP and related process are well designed to meet the objectives of the Soliciting Parties, and ultimately to provide consumers with competitively priced, clean energy. We appreciate the efforts of the Soliciting Parties to initiate this process, and we look forward to a release of the RFP to bidders this spring.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Wilby", written over a white background.

David A. Wilby
Vice President, State Policy
North America Utility & Global Wind