

**621 Energy**

152 Commonwealth Ave.  
Suite 21  
Concord, MA 01742  
Phone: (978) 263-5215  
[www.621energy.com](http://www.621energy.com)

February 15, 2025

**Re: Public Comments on DOER 2025 Town Hall**

Thank you for sharing information through the Town Hall and the opportunity to provide public comments and ask questions.

621 Energy has been serving the Massachusetts commercial solar market since 2011 as a developer and solar contractor, generally focused on behind-the-meter projects less than 1 MW for Massachusetts businesses and non-profits.

The Massachusetts solar development environment is challenging today and stalled for several reasons:

- Slow utility interconnection approval timelines
- High utility interconnection costs/upgrades required for many projects and long timeframes for the utility to make those upgrades
- Future uncertainty of the Federal ITC
- Impacts of tariffs
- MA SMART 2.0 incentive program that currently offers a lower payment than the Class I REC market

DOER's work to implement SMART 3.0 is critical for the Massachusetts solar industry. Thank you for sharing the estimated timeline for SMART 3.0 implementation during the Town Hall.

The key factor to "un-stalling" Massachusetts solar development is providing clarity that solar projects with interconnection agreements approved in 2025 will be eligible for SMART 3.0, when the new regulations are approved. Per Samantha Meserve's 10/28/2024 email to the DOER/SMART mailing list: "DOER encourages project developers to NOT slow down development based on the transition in the SMART program."

**QUESTION/COMMENT:**

**Please provide more clarity on DOER's stance on the timeline for qualification for the SMART 3.0 program.**

The Straw Proposal stated that a Project would be eligible "*with an Interconnection Service Agreement (ISA) Date after the Effective Date of the modified SMART regulations that have not previously received a SMART Preliminary Statement of Qualification or a RPS Statement of Qualification will be eligible to apply under the updated program structure. Any project with a pending or approved application in the queue will be subject to the predecessor regulations.*"

Sincerely,

A handwritten signature in black ink that reads "Bob Clarke".

Bob Clarke  
President  
621 Energy