



February 17, 2025

Samantha Meserve  
Director, Renewable and Alternative Energy Division  
Massachusetts Department of Energy Resources  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02114

Re: Public Comment Regarding DOER 2025 Plans

The Solar Energy Business Association of New England (SEBANE) and its members would like to express our sincere appreciation for hosting the town hall on January 27, 2025. The transparency demonstrated in this forum is invaluable to the solar industry, as it helps both companies and customers navigate the complex landscape of clean energy programs, resources, and policies in Massachusetts.

We would like to provide feedback on a key concern regarding the revised eligibility requirements for the SMART program. According to the most recent version of the SMART straw proposal (July 30, 2024), it is our understanding that projects with an ISA (Interconnection Service Agreement) date preceding the implementation date of the new program would continue to operate under the terms and rates of the previous program. However, as we move into 2025, this provision is causing significant confusion among both solar customers and installers. There is uncertainty as to whether it is advisable to proceed with an Interconnection application now, or to delay until there is greater clarity on eligibility for inclusion in the new program.



Our primary concern is that this uncertainty may lead to a delay in interconnection applications, followed by a subsequent surge. This could rapidly deplete available capacity and result in significant delays for projects that are ready to proceed, ultimately frustrating installers and businesses that are eager to adopt solar energy.

**Therefore, we respectfully urge the Department of Energy Resources (DOER) to provide additional clarity regarding how eligibility will be determined. Given that the implementation date for the new SMART program may remain uncertain for some time, we recommend that DOER establish a definitive date for ISAs, establishing a clear distinction: projects with ISAs before this date would operate under the predecessor program, and those with ISAs after this date would be subject to the new program's terms.**

SEBANE would welcome the opportunity to engage further with DOER on this matter, should our input be useful to your decision-making process.

Thank you for your time and consideration.

Sincerely,

/s/ Nick d'Arbeloff

/s/ Lindsay Bourgoine

Nick d'Arbeloff  
President, SEBANE

Lindsay Bourgoine  
Vice President of Policy, SEBANE