



# Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES  
STATE HOUSE, BOSTON, MA 02133-1054

THOMAS A. GOLDEN, JR.  
16TH MIDDLESEX DISTRICT

CHAIRMAN  
Committee on Telecommunications,  
Utilities and Energy

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September 27, 2019

Judith Judson, Commissioner  
Massachusetts Department of Energy Resources  
100 Cambridge Street, #1020  
Boston, MA 02114

Dear Commissioner Judson:

I write to you today in regards to the SMART 400 megawatt straw proposal. I applaud the department for undertaking a thoughtful and comprehensive review to further strengthen the SMART program and offer the following comments for your consideration.


First, I urge the department to grandfather the first 1600 megawatts of the program and apply the proposed policy changes to any additional expansion. The inclusion of a built-in review for the SMART program was a sound policy decision, but given the large amount of solar that applied prior to the 400 megawatt review, any action points drawn from it should only apply going forward.

Second, I recommend that the department balance enhanced environmental protections in SMART with considerations of how to ensure robust solar development as the program moves forward.

Finally, I suggest that the department consider making heat maps directly available to the developers instead of employing a congestion adder or subtractor. The Legislature also considers these heat maps to be a priority, which is why we required the utilities to submit these maps to the department of public utilities in Chapter 227 of the Acts of 2018. Giving developers data from which they can make rational decisions about where to build solar could provide substantial power grid benefits.

I thank you for your consideration of my recommendations and look forward to working with you to advance solar in the state in order to help reach our energy and environmental goals.

Sincerely,

  
**Thomas A. Golden, Jr.**  
State Representative  
16<sup>th</sup> Middlesex District