From: Eric Smith
To: SMART, DOER (ENE)
Subject: 400 MW Review Public Comments
Date: Thursday, September 26, 2019 11:35:08 AM

September 23, 2019

To: Massachusetts Department of Energy Resources (DOER)

Re: Public Comments on SMART 40MW

Dear MA DOER,

Thank you for the opportunity to comment on the SMART 400 MW Review.

As Director of Planning and Development for the Town of Athol, I am in the front line in the community in regards to the planning and permitting of large ground-mounted solar arrays. When I first learned about the proposed SMART program in the summer of 2017 during a time period when Borrego Solar Systems, Inc. was undertaking a site plan review for a proposed 5+/- mW array on a former gravel pit site. Eventually, I got the chance to review the draft SMART program regulations and was really excited to see that this solar credit program being designed to incentive re-use of Brownfield and previously disturbed sites and dis-incentivizing greenfield (e.g. existing undeveloped and, especially, forested sites).

However, as 2018 moved forward and eventually into 2019 I learned that the actual implementation of the SMART program didn't have very strong incentives fostering the re-use of brownfield and previously disturbed sites and dis-incentivizing greenfield. Even worse, I felt like it was a slap in the fact to see that the Town of Athol was being penalized for adopting a solar zoning bylaw. Mere presence of our bylaw allowed solar developers to avoid the little greenfield subtractor that was put in place in the adopted SMART Program Regulations. Through this 2018-19 period most of the projects that were coming before the Planning Board or just speculated, either through developers or property owners contact me, were almost all greenfield sites. The Town of Athol has been trying to work on landfill project, but due to the State procurement laws and the vetting of a solar developer, by the time that process ended, the SMART program was prescribed and that project sits on hold, especially with the National Grid infrastructure-capacity issues.

Based on my experiences and wishes to see solar array developments truly prioritized for previously developed areas and closer to where the actual power usage is being generated, I have completed a reviewed of the SMART Program 400 MW Review document and applaud DOER for some of its proposed changes, but also challenge that some have not gone far enough. Below I offer my specific comments:

1. Page 2 SMART Application Statistics

The fact that there are waiting lists in both EDCs that service western Massachusetts while Eversource East is only on block 3 of 8 is telling in itself that financial incentives need to be changed to influence the location of future proposals. It is profitability alone that drives where the solar

companies are looking to construct. That profitability is affected mainly by the compensation rates of the program and the cost of land. The cost of the actual solar installation and related equipment is virtually identical regardless of the region of the State. With National Grid and Eversource West having waiting lists while Eversource East has obligated only 25.5% of its capacity, DOER must ask why and make changes that they control to truly influence the location of new installations in the area of need for power. In addition, there are secondary costs to modify the electrical grid due to the concentration of solar installations in rural areas. While these costs are not borne by the SMART program, they are costs created by the program regulations that can be minimized with revisions.

2. Western and Central Massachusetts, with its rural character, should not bear the responsibility of siting an unbalanced percentage of the installations.

3. DOER cannot regulate the cost of land that is far cheaper in western Massachusetts than the rest of the State. So DOER must focus changes in its Category definitions and its financial incentives, including the base rates as well as adders and subtractors such that solar installations are constructed closer to the population needing to be served and strengthening the grid to serve that population.

a. Under land use proposal: I fully support deleting the solar zoned from Category 1. However, the subtractor should not be moved just to Category 2 but rather to EITHER Category 2 or 3 dependent upon the zoning category. Residential zoned land should have the largest subtractor.

b. Increase the proposed greenfield subtractors to 10 times the previous insufficient amount, not just 5 times. By way of a real world example, a solar proposal near Secret Lake here in the Town of Athol, with 46 acres of clear cutting of forest and 30 acres of panels, would have received a subtractor of only 1.5 cents. What a cheap price to put on 46 acres of forestland. This is also on the largest sized installation allowed under the SMART program. If it were only 10 acres of panels, the subtractor would be only 0.5 cents. This amount is not a deterrent to the solar developer, more like a nuisance. It would not sway the decision to build or not. The subtractors need to be similar in magnitude as the adders such as 3 cents for a brownfield, or 4 cents for a landfill.

c. The greenfield subtractor should also be calculated on the total forest area cleared, not just the area of the solar panels.

d. I agree with eliminating the rate of decline for location-based adders.

e. I agree with increasing the public off-taker adder.

f. I strongly support the development of a new preferred interconnection adder/subtractor. This would recognize the non-SMART program costs of constructing installations where there exist grid limitations. They must be of sufficient magnitude to influence the location of the installation.

g. I agree with the concept of a pollinator adder, however, it is weighted the same as the subtractor for the use of greenfields. The cumulative environmental impacts of the use of greenfields are far greater than the benefit of pollinators. This is just an example that the weighting of the greenfields subtractor should be increased.

I thank you for this opportunity to comment on the program. I hope that DOER will revise the program regulations such that it truly influences where the solar installations are located.

Overall, my 2 priorities areas that should be given the proper adders to foster additional ground-mounted solar array (with subtractors finally dis-incentivizing the greenfield clear cut sites) development would be:

a. areas closest to where the power is being generated (which then would not force our utility infrastructure to be upgraded as much I would suspect); and

b. previously developed lands in our area (e.g., focusing siting of solar arrays on parking lots, buildings and to gravel pits/brownfield sites).

In addition, the Town of Athol just completed a public survey seeking opinion on issues related to the zoning of large ground-mounted arrays. This survey is being undertaken as the Athol Board of Planning and Community Development (e.g., Planning Board) works to develop amendments on the existing ground-mounted solar photovoltaic installations zoning bylaw during a moratorium period. The moratorium was approved by Athol Town Meeting Voters 178-2 at a July Special Town Meeting. Over 150 responses to the survey were received and one key finding that supports what I have shared above is that almost 80% of respondents believed that more focus should be on siting solar arrays on “brownfield” sites, parking lot canopies, existing commercial or industrial buildings and municipal-owned sites.

Sincerely,

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