From:	Stan Kugell
To:	SMART, DOER (ENE)
Subject:	400 MW Review Public Comments
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Please increase SMART payments for commercial building rooftop solar projects.

These projects are currently difficult to finance because the costs are higher than ground mounted systems, and the SMART numbers are currently insufficient to overcome those costs in large volume.

Higher costs for commercial rooftop projects include higher system design costs, higher electrical wiring costs, weaker amortization of common components such as inverters, roof maintenance needs, higher business transaction costs with building owners and tenants, inadequate financial reward to persuade building owners, and others.

However commercial building rooftop projects are the best long term value for the public. These projects have the lowest cost to society, because they do not mar the landscape, and they do not require construction of new transmission and distribution facilities.

Thank you