From:	Nancy Nylen
To:	SMART, DOER (ENE)
Subject:	400 MW Review Public Comments
Date:	Friday, September 27, 2019 1:35:37 AM

Thank you for the opportunity to submit comments regarding the SMART program 400 MW Straw Proposal. I was able to attend the public meeting in Lenox on September 5th, and am following up on my verbal comments pertaining primarily to SMART incentives related to **Community Solar** projects. I am writing to briefly describe our situation, and ask for your help and consideration of changes to the SMART incentive structure that would help make an affordable community-based ownership model possible.

I am part of a citizens group in north Berkshire County that has been trying for more than 3 years to get a community shared solar project off the ground. Our North Berkshire Community Solar effort grew out of a very successful Solarize Mass program in Williamstown, as our local climate action committee (Williamstown COOL Committee) was looking for an alternative for people of all income levels who didn't have a good site to install rooftop or ground mounted PV at their homes. We are currently engaged in a Solarize Plus program, along with neighboring North Adams, and residents are already asking about a community solar option.

We understand that the Commonwealth is encouraging community shared solar, and we think that community shared solar could be a good complement to the Solarize Mass program. Community solar provides an exciting option for households who can't install solar to join together to invest in solar in a manner that provides benefits similar to putting PV panels on their home. But, the current incentive structure seems to favor well-capitalized solar companies who are building large-scale projects - and not community/grassroots groups hoping to build small and medium scale projects.

Our goal is to build one or more ownership-based projects to serve 5-50 local families (vs. subscription-based projects where participants get discounted electricity). We would like participants of all income levels to have the opportunity to own a share of the project, and receive electricity (in the form of on-bill credits) proportionate to their needs, and short and long-term financial benefits as well. We have an enthusiastic core of households and two viable sites, but keep running into roadblocks.

Specifically, our two sites (both in National Grid service territory) each have distinct challenges that we hope could be overcome with changes in the SMART program.

Our primary site is a municipal site with capacity for 250 kW and access to 3-phase power. This is the fifth site we have tried to develop, but each time have found it extremely difficult to get a project “shovel ready” - initially to get into the queue for a net metering allocation - and more recently into the queue to qualify for SMART incentives. As a volunteer community group working with local residents of all income levels, it has been difficult to fund pre-development site/engineering/permitting work on speculation. We find ourselves competing with well-capitalized solar companies who are building much larger projects – and enrolling participants in a subscription project for discounted electricity. And, now that we have the property and the funds, the incentive blocks for community solar have filled, and the incentive level has decreased. Even if the blocks now

open up, we're not sure we can make the economics work for a moderate sized community-based project with direct ownership.

We also have access to one small private site (and possibly several) where we could install a 25 kW net-metered system to serve a handful of families. But, the property doesn't have 3-phase power, and the cost of bringing in 3-phase power is cost prohibitive. We don't understand why 3-phase is required for net metering such a small system. If that requirement could be waived - the project could proceed.

It has been suggested that we proceed with one or more small projects (less than 25 kW) via the SMART program, using the alternative on-bill credit instead of net metering. It is our understanding, however, that we would only get SMART incentives for 10 years, and then would be selling the electricity back into the grid at the wholesale rate. Again - this is cost prohibitive, and seems an unintended consequence for essentially neighborhood community solar.

We are feeling pretty stuck at this point. I would love to hear that we're missing or misunderstanding some part of the regulations, and that there is still a way to proceed.

In the meantime, the following are a few possible suggestions:

1. Consider increasing the size of "small" projects from 25 to 250 kW. This change could result in community solar on parcels 1 acre and less – helping meet the needs of small groups of residents who cannot install systems on their property - and likely reducing the competition between modest and large-scale projects for the same incentives.
2. Consider eliminating the requirement of 3-phase power for allowing net metering of 25 kW projects – or even up to 50 or 100 kW. This would open up opportunities in rural areas not served by 3-phase power. Small systems could serve several families with modest usage.
3. Consider a carve-out for direct ownership community solar, to help ensure benefits accrue to participants of all income levels and their communities.
4. Consider an adder for projects that serve 25% low and moderate income families, and a higher adder for projects that serve 50% and more.

Thank you for your consideration. I welcome your thoughts, about these and/or other ways that we might increase access to affordable clean energy for residents and small businesses of all income levels across the Commonwealth.

Most sincerely,

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