



September 27, 2019

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

400 MW Review Public Comments: Low Income Customer Participation, Protections, and Benefits

Dear Commissioner Judson,

We hope all is well. The Solar Massachusetts Renewable Target (SMART) program should benefit and be accessible to all investor-owned utility ratepayers, especially Low Income Customers. To achieve this, Sunwealth supports: 1) expanding the customer base that qualifies as Low Income Customers to include all residents in low income communities, and 2) streamlining the way Low Income Community Shared Solar (LICSS) projects provide clear benefits to Low Income Customers.

1. **Expanding who Qualifies as a Low Income Customer.** We support the efforts of low-income advocates and the solar industry to expand the definition of a Low Income Customer to include residents in Energy Justice Regions as submitted by Vote Solar and others on August 16, 2019.

As we increase low income customer participation, we must ensure customer protection and guarantee that a significant percentage of the LICSS Adder is shared with Low Income Customers.

2. **Streamlining and Providing Clear Benefits to Low Income Customers.** To meet these goals with little to no additional administrative requirements, we propose that a Generation Unit can qualify as LICSS if the Generation Unit can demonstrate that it is:
  - a. Transferring a minimum of 2/3 of the value of the LICSS Adder directly to Low Income Customers in the form of Bill Credits (either AOBCs or NMCs);
  - b. Not requiring any payment in return for the Bill Credits; and
  - c. Using a One-Page Contract to clearly show that Bill Credits will be transferred to Low Income Customers for no payment (e.g., free and clear). This One-Page Contract may

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be standardized by the DOER and submitted in conjunction with a Customer Disclosure Form.

The upfront calculation for determining whether 2/3 of the incentive value is provided to a Low Income Customer is relatively straight forward. **The percentage of the Bill Credits that would need to be allocated to Low Income Customers is calculated as follows:**

*Bill Credit Allocation =  $2/3 \times (\text{LICSS Adder in \$ per kWh} / \text{value of Bill Credit in \$ per kWh})$*

*For example, the Bill Credit Allocation to Low Income Customers for a facility located in Eversource NEMA based on the first tranche of the LICSS adder and assuming market net metering credits valued at \$0.12 per kWh would be equal to  $2/3 \times (\$0.06 \text{ per kWh} / \$0.12 \text{ per kWh}) = 40\%$ . To be eligible for the LICSS adder, this example project would need to submit a Schedule Z in which at least 40% of the NMCs are allocated to Low Income Customers.*

These revisions would reduce barriers to low income participation in line with how SMART currently operates, while increasing customer protection and guaranteeing savings to Low Income Customers. There are a few additional details that would need to be finalized; however, there are many feasible solutions. Please let us know if we can be of further assistance.

Thank you for your consideration in this matter.

Sincerely,



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CEO



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