

9/26/2019

Comments on 400MW review of the SMART solar incentive program

Sent to the Sec of Energy and DOER

I attended the UMass review and raised my hand to speak but was never called on.

The review describes an important program that does not appear to be working. Relatively little solar has been installed since its inception, yet we need a massive increase in solar to meet our state Global Warming Solutions Act. Perhaps this is outside the purpose of this review, but I recommend that the SMART program be scrapped and replaced with an incentive program based on the older SREC program that appeared to work well but with smaller incentives.

The review ignores several specific ways it is not working and only tweaks small details that the public focuses on.

- Why is there such a large disparity in installed solar compared to approved projects? The DOER was not able to answer this when it came up in the public review. Find out why and make changes to fix this. Perhaps add a time limit that projects need to be started or require them to resubmit.
- How was multiplying by 5 chosen for the Greenfield subtractor? Again, the DOER could not answer how this was arrived at. Many people at the review felt 5 is too small, others that it is excessive. I think you need something other than a subtractor to shift projects from their preferred location. Perhaps limit the number of large projects as a percent of the forested land in a town. The entire SMART program is too aimed at encouraging large commercial projects (by making the incentives predictable) rather than attractive to homeowners (generous but variable).
- At the review, there was confusion as to what the 'per acre' measures were based on? The amount of cleared land? Only land covered by panels? Based on the total square feet of panels installed? The review does nothing to clarify how this is calculated.
- The review did nothing to clarify what seems to be a mismatch between town zoning and Greenfield classification. Many towns are still writing their solar bylaws, and DOER should offer assistance to help them get it right. These changes should make it clear that merely mentioning solar in a bylaw does not prevent that land from being in the larger subtractor class.
- The 800MW expansion is much too small.
- The incentives for storage should be much larger. Solar matched with storage should be encouraged.
- We need a special carve out for 'medium' sized projects, perhaps 25 to 250 kW.

- Incentives to encourage preferred siting need to be more direct. More carrots, fewer sticks. Provide grants to build the canopies for parking lots that are then covered with solar. We need solar parking lot canopies with storage and chargers.
- Combine SMART incentives with the goals of the clean peak standard. The value of solar added to the grid should more reflect the cost of power at the time it is generated.
- Hold another review, perhaps in a year, to ascertain how the program is working.
- What can be done to require utilities to expand their capacity ahead of solar expansion.
- The review did very little to increase solar in low income/justice communities.

Right now you have an opportunity to make significant, critical changes to this program. Although I prefer returning to something closer to the older SREC program, please don't just make small tweaks and be satisfied.

Thanks

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and Chair of FCCPR Climate Crisis Task Force