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100 Cambridge St.
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RE: Comments on SMART Program 400 MW Review

To whom it may concern,

CVE North America, Inc. is an IPP with 6 projects totaling over 30 MW enrolled in the SMART program. We currently have hundreds of thousands of dollars invested in projects we are developing in the Eversource East service territory. These projects are stuck in the Eversource East interconnection queue. As DOER is aware, the Eversource East queue represents a major issue for the solar industry and a solution to the issue is currently under investigation by the DPUC. Based on the current time required for Eversource to complete studies, and the length of queues, estimates for when a project might have an ISA can range from one to two years.

DOER has proposed multiplying the amount of the greenfield subcontractor in the program by 5. Our projects cannot work financially with the additional greenfield subcontractor proposed by DOER. DOER has proposed grandfathering projects which are under development under the "old" rules provided they have the documentation to obtain an SOQ prior to the new rules taking effect. This is estimated to be the middle of November. These documents would include an ISA. Since we cannot have our projects studied, let alone get an ISA while they are stuck in queue, we would not be able to be grandfathered in under the "old" rules. We began the development of these projects in good faith based on the rules in effect at the time. We would kindly request that DOER establish that the requirements for being grandfathered under the "old" rules be; one, that proof be provided an application for non-ministerial permits has been submitted; and two, that proof an Interconnection Application has been submitted be provided.

Respectfully,

CVE North America, Inc.

