



Commissioner Judith Judson  
Department of Energy Resources  
100 Cambridge Street, Suite 900  
Boston, Massachusetts 02114

September 27, 2019

Subject: SMART Program 400 MW Review & Expansion Recommendations

Dear Commissioner Judson:

A broad coalition of solar industry organizations including MassSolar, SEBANE, NECEC, SEIA, CCSA, and Vote Solar, provided the Massachusetts Department of Energy Resources (DOER) with comments on September 27, 2019 that identified several fundamental issues with the proposed 400 MW SMART program changes and made some recommendations about how those 400 MW program changes might be further enhanced.

The undersigned solar industry businesses and advocacy organizations support the recommendations outlined in that document. We will not reiterate those recommendations here except to emphasize the urgency of expanding the SMART program by at least 3,200 MW, for a total program size of 4,800 MW.

However, the solar industry recommendations mentioned above did not fully address the need for greater market diversity, returning economic benefit to our communities through Behind the Meter (BTM) and smaller scale distributed generation installations and supporting Massachusetts based solar installation companies and the jobs they create.

We the undersigned are requesting that the DOER support the following recommendations in order to boost the small to medium size PV installation market, supporting local direct system ownership and the businesses installing them. This class of solar is critical to leveraging the local economic benefit of the SMART program and meeting the market diversity goals of the DOER.

#### Recommended SMART Program Expansion and Adjustments

1. To meet the Commonwealth's clean energy goals, the SMART program should be expanded by at least an additional 3,200MW, to 4,800MW. This expansion should

be designed to support the DOER's goals for increased diversity of project type and to ensure more of the SMART program incentive remains in our local communities.

2. **We recommend that the DOER create an additional carve out of no less than 500MW for systems sized from 25 kW to 500 kW.** The 400MW update should ensure that the SMART program provides adequate capacity for four years and adequate compensation rates required to serve a diverse base of clients, promote installation by Massachusetts based solar installers, and that a fair share of the expanded program benefits are returned back into the local economy.

We felt that the DOER's original 400MW review proposal took those concerns quite seriously and would have acted to protect and encourage the development of these highly desirable projects. However, we are now concerned that the latest proposal allowing projects over 500kW to proceed with energy storage could easily result in those large projects squeezing out the highly desirable 25 kW to 500 kW projects that DOER's original draft 400MW proposal would have protected.

We recommend a regular review and assessment of the 25 kW – 500 kW carve out that would determine whether the SMART program is providing adequate capacity to ensure that program diversity goals are achieved. This would include at least annual reviews of the total capacity of new projects receiving Statement of Qualification for this market segment to ensure that SMART program capacity is being adequately allocated among all market segments.

3. We also recommend that the DOER increase SMART program compensation levels for this 25 kW to 500 kW segment to ensure SMART program diversity goals for behind the meter, rooftop, canopy, low-income solar projects and projects in located in underserved territories closer to load will be achieved. One way to achieve that objective would be to freeze the decline rate for these projects at the levels for currently set for Block 4. We would also encourage the DOER to create an adder for rooftop repair as one way of encouraging additional rooftop installations.
4. Two axis solar trackers are currently not eligible for any SMART program system adders. These high producing systems can easily produce enough power to offset the average residential load. Two axis trackers should be allowed to receive an adder. We recommend that the DOER allow two-axis trackers to receive the canopy adder and that systems under 25 kW also be eligible for this adder.
5. Page 9 of the current SMART regulation (225 cmr 20.05 (i) 2) addresses the restrictions/limitations placed on Replacement Solar Tariff Generation Units. We appreciate that the DOER recognized that it is burdensome to wait a year before submitting an SQA for a replacement STGU. We thank the DOER for allowing

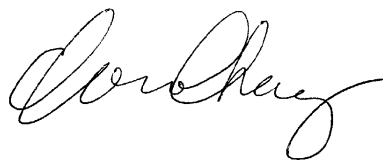
customers replacing those old systems with higher capacity systems to secure SMART program compensation for the proportion of the system that represents an increase in the system size. We would request that those customers also be able to receive SMART compensation based on the length their original systems have been in service. For example, if an older system has been in service for 10 years under the 20-year SREC program, then half of that system capacity should now be eligible to participate in the SMART program.

On behalf of the local solar industry, we the undersigned signify our support of the aforementioned revisions to the SMART program and urge the Baker-Polito Administration to move forward as quickly as possible to implement these recommendations.

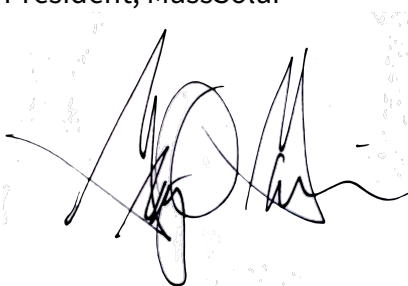
Sincerely yours,



Mark Sandeen  
President, MassSolar



Claire Chang  
Partner, Solar Store of Greenfield



Greg Garrison  
President, Northeast Solar



Haskell Werlin  
Solar Design Associates

Cc: Kathleen A. Theoharides, Secretary, Energy and Environmental Affairs  
Patrick Woodcock, Undersecretary of Energy  
Eric Steltzer, Acting Director, Renewable Energy Division  
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