From:	rflashman@comcast.net
To:	SMART, DOER (ENE)
Cc:	Cathy Kristofferson; Conscom; Beryl, Weinshenker
Subject:	400 MW Review Public Comments
Date:	Monday, September 23, 2019 2:46:50 PM

I am writing to comment on the Department of Energy Resources (DOER) review of the Solar Massachusetts Renewable Target (SMART) program. As an outdoor enthusiast, I am concerned that the SMART program has not been doing enough to direct new solar development to already developed and/or impacted areas. The clearing of forestland for new solar development is fragmenting our forests, destroying important wildlife habitat.

Additionally, as a landowner and a dedicated "do-gooder" who would like to create a small Community Solar project (<25kw) on my land, I would like to comment on the difficulty of targeting low income people as off-takers for a project.

1) The SMART program, because of understandable concerns for personal privacy, has created no vehicle for ensuring that low income people can be identified and approached for participation in community solar. Instead, the new proposal suggests that projects be able to target "low income blocks", which have some low income people living within that block. For the limited energy being produced by a small project, this hit or miss approach may result in a reduced rate being offered to a moderate or high income person rather than the intended target.

2) The SMART program has provided no incentive large enough for a small project to be able to build the billing and collection infrastructure that would be required to sell the energy from the project.

So, the SMART program is, potentially, enabling the utilities to offload bothersome, low profit customers to community solar projects for $.01 - $.02 per kilowatt adder. This is despite the fact that a community solar project would, most likely, be attempting to sell energy to these low income people for less than the price being currently charged by the utility. Is this an incentive?

Perhaps a better approach would be to leave the identity of these people within the billing systems of the utilities. The utility companies have the systems in place to report on every kilowatt of energy produce by a project/producer. Furthermore, as exhibited by the utilities' residential billings based on the prices of aggregators, they could similarly bill for energy being generated by community solar projects for low income people. They have the billing systems in place. They have the collection systems in place. And, they have the identified low income accounts to which they could offer the community solar energy as a lower cost alternative.

Requiring a small community solar project to take on all these difficult pieces of infrastructure makes no sense, since the infrastructure already exists. All that is required is a reporting/payment system for a Community Solar project and reporting to the State DPU to ensure that the accounting is true and accurate.

Thank you for the opportunity to comment on the Department's review of the SMART program.

Sincerely,

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