Comments regarding the SMART 400 MW review for the next phase

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LAND USE:

The current political goals (which thankfully have emerged through the political process) for the state of Massachusetts, call for 50% renewable energy in the mid-term future. I believe these goals are impossible to attain for a reasonable future solar share as long as DOER continues to be all things to all special interests. With all due respect, I realize this situation results from the sausage making process of trying to develop a policy.

The stated goal to "steer development (away) from large scale ground mounted projects in undeveloped spaces" is not consistent with reaching these goals. These larger scale facilities with reasonable land, site development, and interconnection costs are by far the lowest cost solar generators and can be lower with better and more accepting policy by state and local entities.

According to material from the US Forest Service and the UMass Forestry department, Massachusetts is the eighth most forested state in the U.S. What is wrong with harvesting some of the timber crop in order to provide clean energy? Flying over western MA west of Worcester, all that can be seen is woodlands. The same with driving the secondary roads. Since I have walked through a lot of it, I can attest to much of it being unmanaged and overgrown. This is a crop which has to be harvested or it will blow down or burn down.

Saving agricultural land is another policy with good intentions but doesn't help multi-generational farmers keep their land or move on to another use having higher income or sales value. Solar fields are the best use currently to keep our agricultural land basically intact for 25-30 year increments.

Zoning bylaws have matured to require better screening and extra open spaces for solar lots. To obtain parity with wind and gas generators, including "peakers", we need large ground mounts and battery storage systems which include both the use of under-utilized farmland and undeveloped woodland of moderate slopes. Having penalties for these systems will only render many projects uneconomic and we will soon end up with only roof, parking, and brown field systems in MA. Even those will become scarce as the larger program fills.

Most, if not all of the economic utility distribution connection capacity at existing substations for larger arrays are basically taken through the present build out. The very high connection upgrade costs experienced now for many new projects only make more projects unfinanceable after spending time and hundreds of thousands of dollars of soft costs, and then getting a huge interconnection bill as the last piece of required information (which may kill the project). The "subtractors" for the new SMART tariffs proposed for these larger projects can amount to $.06-$.10/kwh. This is a deal killer for most if not all of these projects. Many projects already indicate

a lower return than the utilities non-competitive allowable returns without the community adder and some are lower with the adder.

My specific suggestions are as follows:

- Eliminate the penalty for larger systems which are ground mounted. Consider adding a modest adder, if zoning requires large acreage increases for larger fields (e.g. 50-100% more land than required.

- Allow larger projects than 5 MW ac as long as it can be reasonably and economically connected or a new interim substation can accommodate it and it can be reasonably screened.

- Allow non-profit schools and colleges/universities to qualify for the Public adder and not be required to own the required land or roof under the facility (e.g. allow off site virtual net metering again). These are institutions who really want this type of energy but many don't have extra land.

- If the solar and wind industry is going to continue to be required to build out the new and greatly expanded distribution equipment and wires to support the renewable energy growth envisioned by government, as well as the gross up for taxes owed by the distribution utilities, consider a change to being reimbursed by the utility for the upgrade costs once in commercial operation (with no tax gross up); and then the utilities should put the cost in their base for rate recovery. I think this would also eliminate the unfairness of the first large project in on a radial to a substation having to absorb most of the upgrade cost for follow on projects.