

**621 Energy, LLC**

152 Commonwealth Ave.
Suite 21
Concord, MA 01742
Phone: (978) 263-5215
www.621energy.com

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SMART Program - 400 MW Review Public Comments

Thank you for the Massachusetts DOER's work to date on the SMART program solar initiative and for establishing a means to receive public feedback for the 400 MW Review and the "Straw Proposal". We appreciate the opportunity to provide feedback.

621 Energy has been serving the Massachusetts commercial solar market since 2011 as a developer and solar contractor, generally focused on projects less than 500 kW for local businesses and non-profits.

For reference, the following table is produced using the data from the SMART qualifications through 8/19:

	Total Qualified through 8/19		Behind the Meter Project		Building Mount & Canopy Adders	
Project Capacity	MW	%	MW	%	MW	%
<=25 kW	84	8.5%	83	67.5%	N/A	
>25 kW and <=250 kW	53	5.4%	19	15.4%	52	37.5%
>250 kW and <=500 kW	40	4.1%	14	11.4%	37	27.0%
>500 kW and <=1000 kW	70	7.1%	5	4.1%	27	19.2%
>1000 kW and <=5000 kW	737	74.9%	2	1.6%	22	16.3%
TOTAL	984	100.0%	123	100.0%	138	100.0%

I have the following major concerns regarding the SMART Program to date, in line with concerns mentioned by DOER. Suggestions follow each item:

1. As the DOER 400 MW review notes, "Small and mid-size commercial applications compete for capacity with large ground mounted applications". This proved quite problematic in National Grid and the former WMECO territories as small commercial and non-profit rooftop projects with 2018 ISA's received vastly reduced incentives as large ground-mount solar projects ate up the capacity blocks. Systems greater than 1 MW used 75% of the Block capacity. Most of these large projects are to be installed on valuable Greenfields. Many of these projects are also causing grid capacity issues that are impacting smaller customer's opportunities to install solar.

I would suggest carving out 25% of the overall expansion capacity for a 25 – 500 Kw Block, similar to the <25 kW Block. This would give small to medium Massachusetts businesses, non-profits and municipalities a real opportunity to install solar at their buildings and not compete against large ground-mounted solar projects.

2. Behind the Meter (BTM) projects represented only 12.5% of the overall project capacity. Ratepayer costs for BTM projects are estimated to be about 1/3 of a similar stand-alone project based on your

Review. Standalone projects will also have a drastic drop in revenue after 20 years when the SMART incentives end, likely leading to removal or even abandonment. BTM systems will provide worthwhile electricity savings after the 20-year SMART incentive period.

The Straw Proposal addresses the BTM inequity at length. Looking at Slide 18, even with the proposed adjustments to the incentives, a BTM system still has less overall value than a stand-alone system to the customer, at 30% of the cost to the ratepayers. I believe that these factors need to be further adjusted so that a BTM system is 10 to 20% more valuable to the customer than a stand-alone system, making the decision easy. This will save the ratepayers substantial cost.

3. Building Mounted and Canopy mounted systems provide optimal use of the existing built environment and have minimal environmental impact. Unfortunately, only 14% of the qualified unit MW's greater than 25 kW received these adders.

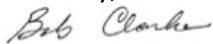
The Straw Proposal significantly increases the greenfield subtractors and removes the location adder tranche decreases. We strongly support both of these proposed changes. I would further suggest an increase in the location adders by 2 cents per kWh. The 4% Block by Block decreases in incentives were predicated on decreases in the cost of solar projects over time. Unfortunately, the cost of solar projects is not less than when the SMART program started for small to mid-sized projects.

4. Putting the electric utility in charge of furnishing the revenue grade solar production meter has added significant cost, coordination and time for behind the meter systems. On all projects, we are separately installing a second customer-owned solar production meter so that the customer has real-time access to their production information.

The Straw Proposal addresses the meter issue as it relates to energy storage only. The solar production meter for all systems should be moved back into the responsibility of the system owner as during the SREC program.

Thank you for your consideration.

Sincerely,



Bob Clarke
President
621 Energy, LLC