From: joan pierce
To: SMART, DOER (ENE)
Subject: 400 MW Review Public comments
Date: Friday, September 27, 2019 10:33:45 PM

Joan W. Pierce
75 Willow Ave.
Quincy, MA 02170

Judith Judson, Commissioner
Mass. Dept. of Energy Resources
100 Cambridge Street
Boston, MA 02114

Re: 400 MW Review Public Comments

Dear Commissioner Judson:

Thank you for this opportunity to submit a brief comment on the above-referenced subject.

Others have articulated facts and concerns about the incentives being ineffective in deflecting the siting of large ground-mounted solar arrays away from precious important natural and agricultural resources so I will not speak to that topic.

Rather I will restrict my comment to a particular section of the current regulations, 225 CMR.20.07 10. Confidentiality.

At the public session in Boston on Sept. 9, 2019, I asked the DoER staff person to explain the public benefit(s) resulting from such a severe restriction to public access to the application and decision making process. While the DoER staff person was extremely knowledgeable about the SMART program and competently answered questions from attendees, in my opinion, she was at a complete loss to explain the purpose behind this confidentiality requirement.

Simply, this Confidentiality section of the SMART regulations must be deleted. Completely. Immediately. Starting with the emergency implementation of the revised regulations scheduled for November, 2019. There is no justification for such opaqueness into a process for which the taxpayer, i.e., ratepayers, are paying the bill.

Perhaps you are unaware that DEP, for example, makes standard arrangements for any member of the public to view any file (except those portions pertaining to litigation or privacy issues). An appointment is all that is necessary at the regional office to view any application for any permit.

I ask my question again: how is the public better served by lack of transparency into the application and decision making process pertaining to prospective STGUs?

Thank you for consideration of these comments.
Sincerely,
Joan Pierce

Citizen, voter, taxpayer, consumer and ratepayer

Submitted electronically to DOER.SMART@mass.gov