

**Via E-Mail**

September 27, 2019

Judith Judson, Commissioner  
Massachusetts Department of Energy Resources  
100 Cambridge Street  
Boston, MA 02110

RE: SMART 400MW Review

Dear Commissioner Judson:

The Northeast Clean Energy Council (NECEC) appreciates the opportunity to submit this brief supplemental comment related to the Department of Energy Resources' (DOER) 400MW review of the SMART program. NECEC greatly appreciates DOER's leadership in developing and administering the SMART program which has stimulated the development of solar and solar+storage projects across the Commonwealth.

In collaboration with several other organizations, NECEC is filing joint comments on a number of elements of DOER's SMART 400MW Straw Proposal. In addition, NECEC offers this discrete, supplemental comment in support of DOER's stated goal of increasing the development of behind-the-meter (BTM) solar and solar+storage projects.

We share DOER's interest in stimulating greater participation from this set of customers and recognize that participation from this segment has been lower than expected or desired. NECEC is aware that other entities, including Enel X, will be filing comments today proposing a limited, separate tranche for behind-the-meter C&I solar + storage projects. To help address the BTM challenge, NECEC supports this concept provided that it does not detract from opportunities for other SMART-eligible projects and that it remains modest in size.

Should you have any questions, please do not hesitate to contact me at 617-500-9994.

Sincerely,



Jeremy McDiarmid  
Vice President, Policy & Government Affairs