



September 27, 2019

Judith Judson, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, 10th Floor
Boston, MA 02116

Re: Solar Massachusetts Renewable Target ("SMART") Program 400 Megawatt Review-
Low income ("LI") and environmental justice ("EJ") participation

Dear Commissioner Judson:

The undersigned organizations ("LI&EJ Advocates") write to provide our comments on the Solar Massachusetts Renewable Target Program ("SMART") 400 megawatt ("MW") review. Specifically, the LI&EJ Advocates write to provide recommendations on the participation of low income ("LI") and environmental justice ("EJ") communities in SMART.

We appreciate the recognition from the Department of Energy Resources ("DOER") that the amount of solar serving LI customers in SMART is inadequate and needs to be increased. We look forward to working with DOER and other advocates to ensure SMART works for all communities in the Commonwealth. The LI&EJ Advocates hope that following comments are helpful and informative.

INTRODUCTION

On August 16, 2019, BlueHub Capital, Resonant Energy, and Vote Solar submitted a proposal for an [Energy Justice Option](#) in SMART on behalf of more than 20 organizations.¹ The comments contained in this document are an evolution of the Energy Justice Option, and represent many conversations held with a variety of advocates over the past month and a half. The proposal contained herein has many of the elements of the Energy Justice Option but has been modified in response to stakeholder feedback to better serve LI customers and create business models that will allow a broader variety of solar developers to serve LI and EJ communities.

SUMMARY

The LI&EJ Advocates want to create a robust solar program that addresses energy affordability for low income and environmental justice households by:

¹ For more information, please visit <http://www.resonant.energy/smartpolicyfix>

- a) Providing material savings on electric bills;
- b) Targeting savings to the lowest income households;
- c) Creating access to savings for a broader range of residents of low income and environmental justice communities; and
- d) Instituting consumer protections for low income and environmental justice communities.

In order to achieve these objectives, the LI&EJ Advocates propose two primary recommendations for SMART:

- (1) A program for customers on the R2 and R4 rates (collectively, “low income rates”), herein referred to as the R2/4 Program. This program would allocate uniform benefits to all LI customers in a specified geographic area (or areas) on an opt-out basis.; and
- (2) A program for customers in environmental justice neighborhoods (“EJ Program”). This program would require customers to sign up for a no-cost allocation of benefits.

As described in this letter and in the August 16 Energy Justice Option proposal, a key feature of the Energy Justice Option proposal is a SMART compensation mechanism option that allows bill credits to be allocated without requiring a payment or contract. In the LI&EJ Advocates’ view, this option should be available not only for Low Income Community Shared Solar (LICSS) solar facilities but also for Low Income Property and Low Income (under 25 kW) solar facilities.

R2/4 PROGRAM

Eligibility

The R2/4 Program would be eligible to all customers on the R2 and R4 rates. These customers are easily identifiable by the electric distribution companies (“EDCs”) or community action program agencies (“CAP agencies”). The EDCs would organize the R2 and R4 customers into geographic groups (such as by municipalities, zip codes, and/or census tracts) based purely on the service address of the R2 and R4 customers. The easiest delineation is by municipality. However, while a municipality will work for most of the Commonwealth, some cities have too many R2 and R4 customers to bring meaningful benefits (see below in *Target Allocation*) to all of them from one project. In such cases where a municipality includes a significant amount of R2 and R4 customers, the municipality might be broken down into smaller geographic areas such as zip codes or census tracts. The LI&EJ Advocates recommend that DOER, the CAP agencies, and interested parties work with the EDCs to determine which municipalities need to be broken into smaller geographic areas. Stated differently, the geographic groups will be no smaller than census tracts, and no larger than a municipality; for simplicity, the geographic groups will be referred to as municipalities.

Target Savings

The goal of the R2/4 Program is to bring meaningful savings to low income customers and address their energy affordability and energy security at no cost to the participating customer. In order to accomplish this, the program is designed to provide uniform benefits to these customers for approximately half of the average electric bills of R2 and R4 customers. Currently, the LI&EJ advocates estimate the target savings to be \$500/year for R2 customers and \$900/year for R4 customers. Please note that the target savings are a snapshot in time; we recommend that DOER reevaluate the target savings when necessary, but not less than every two years.

This means that every project participating in the R2/4 Program will have to deliver an average savings of \$500/year for each R2 customer and \$900/year for each R4 customer. However, we recognize that the number of R2 and R4 customers will fluctuate over time in each geographic area. As such, the savings for each R2 and R4 customer must be in the band of $\pm 10\%$ target savings.

In situations where an individual R2 or R4 customer's three-year average electricity bill is less than the target savings, the EDC shall allocate benefits equal to 90% of the customer's three-year average electricity bill. This should reduce the possibility that an R2 or R4 customer receives a benefit in excess of their yearly electric bill.

In order to bring the target savings to all R2 and R4 customers, the LI&EJ Advocates estimate that approximately 2,500 MW is needed. We recognize that development of 2,500 MW for R2 and R4 customers will take time, but we request that DOER commit to bringing meaningful benefits to the low income residents of the Commonwealth.

Opt-Out Participation

All R2 and R4 customers in the municipality will be given the opportunity to opt-out of participation in the R2/4 Program. If the customer does not opt-out, they will automatically receive the target savings at no cost.

Messaging

The manner in which low income customers are informed about potential participation in the R2/4 Program and the way in which benefits appear on their electric bills are important. The LI&EJ Advocates recommend that the low income customers are clearly informed that they are (or will be) benefiting from solar (ideally, the details of the specific solar facility). We recommend that the DOER work with the EDCs, the CAP agencies, the Attorney General's Office, and other advocates to develop the messaging requirements for the R2/4 Program.

R2/4 Mechanism

Under the R2/4 model, each project will receive its total compensation directly from the EDC, and the EDC will be responsible for allocating the benefits to all R2 and R4 customers in the

municipality (or municipalities). In order to make this work, the low income community shared solar tariff generation unit adder (“LICSS Adder”) needs to be split into two parts. The first part of the LICSS Adder is the portion that benefits R2 and R4 customers. The second part of the LICSS Adder conveys to the project owner. The first part of the LICSS Adder is proposed to be a minimum of 85% of the adder value, which means the portion of the adder that benefits the project owner is no more than 15%. The portion that benefits R2 and R4 customers would be fixed for the duration of the project’s participation in SMART, and would not fluctuate. Project developers will have the discretion to determine the percentage of the LICSS adder that benefits low income customers (≥85% of the LICSS adder) when the project becomes operational. The portion that benefits the project owner is the incentive to participate in the R2/4 Program.

The remaining compensation for the project owner is the value of energy and the base compensation rate. Each R2/4 project will register as a qualifying facility (“QF”), so the compensation for the value of energy is the avoided cost rate as determined by 220 C.M.R. 8.00 *et seq.* The total compensation for the R2/4 project will be the same as a QF participating in SMART, with the addition of the incentive for being an R2/4 project.

R2/4 Project Compensation

$$= (kWh \text{ of production}) * (VOE (\frac{\$}{kWh}) + BCR (\frac{\$}{kWh}) + (\leq .15 * LICSS \text{ Adder} (\frac{\$}{kWh})))$$

In order to qualify for the R2/4 Program, all of the beneficiaries (*i.e.*, recipients of bill credits) must be R2 and R4 customers. Since the project owner receives compensation directly through participation in the SMART program, there is no need for an anchor customer. As such, all beneficiaries of the R2/4 Program should be low income customers.

The LI&EJ Advocates expect that the R2/4 mechanism will be attractive to developers that are primarily interested in building projects. The R2/4 mechanism does not require customer acquisition (and the associated costs) or any other customer-related administrative costs.

Matching Projects with Municipalities

Each project is unique in regard to size and expected production over the course of a year. With the current LICSS Adder of six cents, each R2 customer will require a little over 7 kilowatts (“kW”) in the R2/4 Program in order to receive the target savings.² Naturally, the

² With the current LICSS Adder of six cents, each kilowatt-hour (“kWh”) of production provides a benefit of 5.1¢/kWh to the R2 customer. This means that over the course of a year, each R2/4 project will need to produce approximately 9,800 kWh per R2 customer (\$500 divided by \$0.051/kWh). Depending on assumptions, 9,800 kWh is roughly equal to the production of a system a little larger than seven kW.

characteristics of a system (*e.g.*, size and efficiency) will determine the number of R2 and R4 customers that it can serve. In order to achieve the target savings for each R2 and R4 customer, a project will have to allocate savings to municipalities that have low income customers, in the aggregate, equal to the number of R2 and R4 customers that the project can serve. This will require a matchmaking process.

The LI&EJ Advocates propose that each EDC keep a publicly-available list of the number of R2 and R4 customers in each municipality. Each R2/4 project will then select the municipalities that it wants to benefit through the R2/4 Program. As a municipality is selected (or “matched” to a project), it is removed from the publicly-available list provided by the EDC. In this regard, the number of eligible municipalities will shrink over time as more and more low income customers benefit from the R2/4 Program.

Consumer Protection

There are two factors that essentially eliminate any consumer protection concerns associated with the program:

- (1) customers do not have to pay for the benefit they receive; and
- (2) participation is on an opt-out basis.

When the R2 and R4 customer is notified of their potential participation in the R2/4 Program (and their ability to opt-out of the program), the EDC and/or CAP agency should be required to inform the R2 and R4 customers that participation is cost-free. At no time will the customers be required to pay for the benefits that they receive. This should alleviate any concerns that R2 and R4 customers would not benefit financially. Additionally, the opt-out provision eliminates any concerns associated with customer recruitment. Participation is based purely on the rate class of the customer, which is known by the EDCs and the CAP agencies.

LICSS Adder

The LI&EJ Advocates recommend that the LICSS adder remain fixed and not decline over time. DOER recommends to fix adder value for some location based adders, and we recommend the same approach for the LICSS adder. Under the R2/4 Program, the LICSS adder value represents the benefit that low income customers receive, not an infrastructure or operating cost that could decline over time.

EJ PROGRAM

Eligibility

The EJ Program would be eligible to all customers in eligible environmental justice neighborhoods. For various reasons, households in these neighborhoods have limited access to community shared solar (“CSS”) projects and/or are not well-served by CSS and other solar business models that require contracts for the sale and transfer of bill credits. The

aforementioned [Energy Justice Option](#) included a recommendation for defining eligible environmental justice neighborhoods; and the LI&EJ Advocates largely maintain that recommendation in these comments. We proposed that eligible environmental justice neighborhoods meet the following criteria:

1. The median household income is less than 80% of the state median income; and
2. Meet at least one of EEA's defined EJ criteria.

The Massachusetts Executive Office of Energy and Environmental Affairs (“EEA”) defines environmental justice populations³ as a neighborhoods where:

- 25 percent of the households have an annual median income that is equal to or less than 65 percent of the statewide median;⁴
- 25 percent of its population is Communities of Color⁵; or
- 25 percent of its population identifies as a household that has English isolation.

EEA further defines:

Neighborhood as a census block.

Communities of Color refers to individuals who identify themselves as Latino/Hispanic, Black/African American, Asian, Indigenous people, and people who otherwise identify as non-white.

English Isolation refers to households that are English Language Isolated according to federal census forms, or do not have an adult over the age of 14 that speaks only English or English very well.

The LI&EJ Advocates recommend expanding – but largely maintaining – the EEA definitions of eligible environmental justice neighborhoods. Specifically, we recommend that the following definitions for SMART:

³ From Environmental Justice Policy of the Executive Office of Energy and Environmental Affairs, adopted January 31, 2017.

⁴ In the *SMART Program 400 MW Review* presentation, DOER recommends increasing low income benefits by “[b]roaden[ing] the definition of Low Income Customer to include residents that meet the Low Income Environmental Justice Criteria.” The LI&EJ Advocates assume this reference is to EEA’s first criteria for environmental justice populations.

⁵ The EEA definitions refer to “Minorities.” The LI&EJ Advocates assert that the proper term should be “Communities of Color.”

Environmental Justice Customer. An End-use Customer that is a residential customer that has a service address located within an Environmental Justice Qualifying Census Block.

Environmental Justice Qualifying Census Block. Any census block where the median household income is at or below 80% of the statewide median income for Massachusetts and that meets any one of the criteria for an Environmental Justice Population.⁶ The Department may adjust eligible census blocks. The Department may only add census blocks: (1) that are adjacent to and located in the same municipality as a census block where the median household income is at or below 80% of the statewide median income for Massachusetts and that meets any one of the criteria for an Environmental Justice Population; and (2) where the median household income is at or below 100% of the statewide median income for Massachusetts.

The LI&EJ Advocates recognize that our proposed definition of eligible EJ customers is different than DOER's proposal. We propose our broader definition for two primary reasons. First, we think that 80% of state median income is a reasonable qualifier in order to eliminate wealthier neighborhoods that have some low income residents (and thus avoid providing the EJ Program in wealthier neighborhoods). We note that if there is a concentration of low income customers in affordable housing in a neighborhood, these customers should be able to participate in SMART via the Low Income Property program (see below). Second, we think it made sense to include some eligibility for Communities of Color and English Isolation neighborhoods where the median household income was 80% or below (which is not captured in a purely income eligible framework). In addition, we also support providing DOER with some flexibility to add neighborhoods in the future. For reference, using the MassGIS database, Table 1 below summarizes how many residents are captured by the DOER's proposed methodology and our proposed methodology. A searchable, online map of qualifying census blocks under the proposed LI & EJ criteria is available for review by interested parties.⁷

Table 1: Number of Residents in EJ Neighborhoods

<u>EJ Criteria</u>	<u>Number of residents</u>	<u>Difference</u>
DOER Proposed Criterion	1,042,072	-266,710
LI&EJ Proposed Criteria	1,308,782	266,710

⁶ These are the EEA criteria noted above.

⁷ Please see: <https://mass-eoea.maps.arcgis.com/apps/webappviewer/index.html?id=3b532eb67c2043469f5fc1786f9f0e2d>

Target Savings

Similarly to the R2/4 Program, the goal of the EJ Program is to bring meaningful savings to customers at no cost to the participating customer. The EJ Program is designed to provide uniform benefits to EJ customers of approximately \$250/year. The EJ Program, by design, is not meant to compete with the R2/4 Program (see the *Interaction between the R2/4 Program and the EJ Program* section below). Instead, the EJ Program is meant to provide a benefit to more customers per project, albeit a smaller benefit than the R2/4 Program.

Just like with the R2/4 Program, every project participating in the EJ Program will have to deliver an average savings of \$250/year for participating Environmental Justice Customers (EJ Customers). However, we recognize that the number of EJ Customers will fluctuate over time. As such, the savings for each EJ customer must be in the band of $\pm 10\%$ the target savings of \$250/year.

Participation

Participation in the EJ Program will be similar to community shared solar: EJ customers will have to actively sign up to participate. The difference between community shared solar and EJ projects is that all of the participating customers in the EJ project must live in environmental justice neighborhoods.

The LI&EJ Advocates envision EJ project development being led by community organizations (*e.g.*, religious groups, neighborhood councils, adult education organizations, etc.). In this regard, community organizations will educate and inform their constituents of the ability to benefit from an EJ project, and then facilitate the customer acquisition process.

The LI&EJ Advocates are currently exploring options to empower community organizations to find financial benefits for their constituents, but we do not have any formal recommendations at this time. We are exploring, for instance, a solarize framework for environmental justice community solar where the community organization determines which developer is able to provide the most benefits to their constituents. Our early thinking on this issue is an example of where more time and collaboration could provide a solution with broad support.

Environmental Justice Community Shared Solar Adder

The EJ Program requires the creation of a new offtake-based adder- the Environmental Justice Community Shared Solar (“EJCSS”) adder. The LI&EJ Advocates recommend that the adder be set at 5¢/kWh, and would not decline. DOER recommends to fix the value of the adder for some location based adders, and we recommend the same approach for the EJCSS adder. Under the EJ Program, the EJCSS adder value represents the benefit that low income customers receive, not an infrastructure or operating cost that could decline over time. Just like community shared solar projects, projects utilizing the EJCSS adder would need to serve at least three customers.

EJ Mechanism

Just like with the R2/4 model, each EJ project will receive its total compensation directly from the EDC, and the EDC will be responsible for allocating the benefits to the identified EJ customers. As with the R2/4 Program, the EJCSS adder needs to be split into two parts. The first part of the EJCSS Adder is the portion that benefits EJ customers, and would be allocated to participating EJ Customers' electricity bills at no cost. The second part of the EJCSS Adder conveys to the project owner. The first part of the LICSS Adder is proposed to be a minimum of 30% of the adder value, which means the portion of the adder that benefits the project owner is no more than 70%. The portion that benefits EJ customers would be fixed for the duration of the project's participation in SMART, and would not fluctuate. Project developers will have the discretion to determine the percentage of the EJCSS adder that benefits EJ customers ($\geq 30\%$ of the EJCSS adder) when the project becomes operational. The portion that benefits the project owner is the incentive to participate in the EJ Program.

The remaining compensation for the project owner is the value of energy and the base compensation rate. Each EJ project will register as a QF, so the compensation for the value of energy is the avoided cost rate as determined by 220 C.M.R. 8.00 *et seq.* The total compensation for the EJ project will be the same as a QF participating in SMART, with the addition of the incentive for being an EJ project.

EJ Project Compensation

$$= (kWh \text{ of production}) * (VOE (\frac{\$}{kWh}) + BCR (\frac{\$}{kWh}) + (\leq .70 * EJCSS \text{ Adder} (\frac{\$}{kWh})))$$

In order to qualify for the EJ Program, all of the participating customers must be environmental justice neighborhoods. Just like with the R2/4 projects, since the project owner receives compensation directly through participation in the SMART program, there is no need for an anchor customer.

The LI&EJ Advocates expect that the EJ mechanism will be attractive to community solar developers. The EJ mechanism does include a fair amount of administrative costs – such as customer acquisition, monitoring customer turnover, and communications with participating customers – which is the reason for the greater share of the EJCSS Adder. We note that the administrative costs will likely be less than community shared solar projects due to eliminating the need for billing. In addition, we expect that the amount of benefits that flow to participating customers (*i.e.*, the percentage of the EJCSS Adder going to participating customers) will increase as developers gain experience with EJ projects, but the exactly appropriate split of the EJCSS Adder is unknown at this time.

Consumer Protection

The EJ Program has essentially the same consumer protection concerns as community shared solar, with the notable exception of demonstrated savings to customers. At no time will the customers be required to pay for the benefits that they receive. However, the participating customers will still need to be provided customer disclosure forms. As such, the consumer protection standards that DOER develops should also apply to the EJ Program.

INTERACTION BETWEEN THE R2/4 PROGRAM AND THE EJ PROGRAM

Customer Eligibility for Both Programs

There are R2 and R4 customers that live in environmental justice neighborhoods. For these customers, there may be some confusion about the two programs. As such, the LI&EJ Advocates propose specific rules for the intersection of these two programs.

First, R2 and R4 customers will *not* be able to participate in both programs. The objective of these programs is to bring as many meaningful benefits to as many low income and environmental justice customers as possible. If R2 and R4 customers were able to participate in both programs, it would reduce the potential to serve additional EJ customers.

Nonetheless, if an R2/4 project is not yet serving R2 and R4 customers in an environmental justice neighborhood, then R2 and R4 customers will have the option to participate in the EJ Program. However, If an R2/4 project and an EJ project could serve the same customer, then the customer will automatically be placed into the R2/4 project unless the customer specifically elects otherwise (*i.e.*, opt out). For these customers, DOER, the EDCs, the CAP Agencies, and other advocates might want to develop a specific disclosure that clarifies that the R2/4 project provides a greater financial benefit, but the customer could choose to participate in the EJ Program instead of the R2/4 Program if they so desire.

Finally, a customer that is already receiving a benefit from an R2/4 project and signs up for an EJ project would be rejected. The customer would need to fill out a separate document (an opt-out document) in order to switch from the R2/4 project to the EJ project. As discussed in the previous paragraph, the disclosure would need to be very clear that the customer will receive a lower financial benefit by switching from the R2/4 Program to the EJ Program.

Project Participation in Both Programs

There may be instances where a single project wants to participate in the R2/4 Program and the EJ Program. There shall be no prohibition on a single project participating in both programs so long as all of the customers benefiting from the project are either low income or environmental justice customers. Specifically, all participating customers must be eligible for either the R2/4 Program and/or the EJ Program. The compensation for the project owner would be a mix of the two R2/4 mechanism and the EJ mechanism that is proportional to the mix of low income customers (R2/4 Program) and environmental justice customers (EJ Program).

EXCEPTION FOR EXISTING PROJECTS AND PROJECTS IN DEVELOPMENT

As discussed above, the R2/4 Program and the EJ Program require 100% of the beneficiaries to be either low income or environmental justice customers. While future projects will likely be able to meet this requirement (due to eliminating the need for an anchor tenant), existing projects and some projects that are currently in development already have contracts with anchor tenants for up to 50% of a project. These projects should be allowed to serve low income and environmental justice customers under the proposed rules, in addition to future projects.

As such, the LI&EJ Advocates propose an exception to the 100% low income and environmental justice participation requirement for existing projects and projects in development. In order to qualify for this exception, projects must have a statement of qualification for the SMART program at the time DOER issues revised regulations (assuming the regulations adopt the proposed R2/4 Program and the EJ Program). The existing projects and projects in development will be able to avail themselves of the R2/4 Program and/or the EJ Program, but will not have to meet the requirement of 100% subscription by low-income and/or environmental justice customers.

LOW INCOME PROPERTY SOLAR FACILITIES

The LI&EJ Advocates recommend that any Low Income Property Solar Tariff Generation Unit ("LIP") have the option to select the no-cost option if it allocates 100% of the minimum allocation of the LIP Adder to eligible customers. Just like with the R2/4 and EJ model, a LIP project selecting this option would receive its total compensation directly from the EDC. As with the other programs, the LIP adder needs to be split into two parts. The first part of the LIP Adder is the portion that benefits the low income property or its residents, and the second part of the LIP Adder conveys to the project owner. The first part of the LIP Adder is proposed to be a minimum of 75% of the adder value, which means the portion of the adder that benefits the project owner is no more than 25%. The portion that benefits the low income property or its residents would be fixed for the duration of the project's participation in SMART, and would not fluctuate. Project developers will have the discretion to determine the percentage of the LIP adder that benefits low income property or its residents ($\geq 75\%$ of the LIP adder) when the project becomes operational. The portion that benefits the project owner is the incentive to serve low-income properties. The remaining compensation for the project owner is the value of energy and the base compensation rate.

LIP Project Compensation

$$= (kWh \text{ of production}) * (VOE (\frac{\$}{kWh}) + BCR (\frac{\$}{kWh})) + \left(\leq .25 * LIP \text{ Adder} (\frac{\$}{kWh}) \right)$$

Eligibility

In order to qualify for this option under the LIP Program, all of the participating customers must be low-income properties, as defined under M.G.L. c.40B, or the residents of such housing. This is the same requirement as currently in the SMART regulations.

Adder

The LI&EJ Advocates recommend that the LIP adder would not decline over time. DOER recommends to fix the adder for some location based adders, and we recommend the same approach for the LIP adder. Under the LIP Program, the LIP adder value represents the benefit that low income properties and their residents receive, not an infrastructure or operating cost that could decline over time.

LOW INCOME SOLAR FACILITIES UNDER 25 kW

The LI&EJ Advocates recommend that any Low-Income Solar Tariff Generation Unit ("LIS") have the option to select the no-cost option if it allocates 100% of the minimum allocation amount to qualifying customers on the low income rates or EJ Customers. A LIS project selecting this option would receive its total compensation directly from the EDC. Under the SMART Program, a LIS project receives total compensation of 230% of the applicable Base Compensation Rate. This is greater than the 200% that an identical project that does not serve low income customers receives. As with the other programs, the incremental value for serving customers on the low income rates or EJ Customers needs to be split into two parts. The first part of the incremental value is the portion that benefits the customer(s) and the second part of that value goes to the project owner. The first part of the incremental value is proposed to be a minimum of 75% of the difference in dollars between 230% and 200% of base compensation, which means the portion of the incremental value that benefits the project owner is no more than 25%. The portion that benefits the customer(s) would be fixed for the duration of the project's participation in SMART, and would not fluctuate. Project developers will have the discretion to determine the percentage of the LIS adder that benefits low income property or its residents ($\geq 75\%$ of the LIP Adder) when the project becomes operational. The portion that benefits the project owner is the incentive to serve customers on the low income rates and/or EJ Customers.

LIS Project Compensation

$$= (kWh \text{ of production}) * (VOE (\frac{\$}{kWh}) + (BCR (\frac{\$}{kWh}) * 2 + (BCR * .3 * \leq .25 (\frac{\$}{kWh})))$$

Eligibility

In order to qualify as a LIS project, all of the participating customers must be on the low-income discount rate or be a resident of an environmental justice community as defined under the EJ program above.

NEXT STEPS

Although the LI&EJ Advocates have spent a lot of time and energy working on low income and environmental justice solar participation, we think that additional discussions facilitated by DOER could prove very fruitful. As such, we request DOER convene a working group to discuss low income and environmental justice program design. If DOER elects to not convene a working group, then we request additional time to work through the details of program design with other interested parties.

CONCLUSION

The LI&EJ Advocates appreciate the opportunity to provide comments on the future of solar that benefits low income and environmental justice communities. We believe that the proposals contained herein represent a real and viable opportunity to bring the benefits of solar to the most vulnerable populations in the Commonwealth.

We look forward to working with DOER and other interested parties in the future on this critically important and complex issue. Please let us know if you have any questions, or if we can otherwise help bring solar to low income and environmental justice communities.

Sincerely,

DeWitt Jones
BlueHub Capital

Ben Underwood
Resonant Energy

Nathan Phelps
Vote Solar