



September 26, 2019

Commissioner Judith Judson
Department of Energy Resources
100 Cambridge Street
Boston, MA 02114

Submitted electronically to: DOER.SMART@mass.gov.

RE: Stakeholder Comment Regarding SMART Program 400 MW Review Straw Proposal

Dear Commissioner Judson:

On behalf of the Environmental League of Massachusetts (ELM) I appreciate the opportunity to comment on the Department's SMART Program 400 MW review straw proposal.

ELM offers comments on the following elements of the straw proposal:

1. Program expansion
 - a. The straw proposal calls for an expansion of the SMART program by 800 MW. DOER should consider a larger expansion of at least 1600 MW. The original SMART program was very quickly over-subscribed. This is an indication of significant market demand. An expansion of 800 MW will likely put DOER in a similar position and the program could be oversubscribed again, quickly. Therefore, ELM recommends that the total MW of the SMART program be expanded to at least 1600 MW. This will maintain continuity and market/regulatory certainty for the solar industry and provide greater environmental benefits to the Commonwealth.
2. Link to energy storage
 - a. ELM supports the straw proposal's call for the mandatory pairing of PV installations greater than 500 kW with energy storage. This will provide a boost to the storage industry and better allow grid and distribution companies to manage peak loads and potentially avert the need for additional transmission expansion.
3. Multipliers
 - a. Land use: ELM supports the change contemplated in the straw proposal on slide 9 that would move solar specific local zoning from Category 1 Land Use eligibility to Category 2 for all new projects; allow any project with a Public Entity Adder to qualify as Category 1; and increase the Greenfield subtractor.
 - b. Low income: ELM supports the increase in low income benefits outlined on slide 19.
 - c. Public off-takers: ELM supports the changes for public off-takers outlined on slide 23.
 - d. New Interconnection Adder/Subtractor: ELM supports the new interconnection adders/subtractors outlined on slide 24.

For more information, contact:

Eric Wilkinson, General Counsel and Director of Energy and Policy, Environmental League of Massachusetts
ewilkinson@environmentalleague.org 413-387-7197



- e. New Pollinator Adder: ELM supports the new pollinator adder outlined on slide 28.

We thank you for considering our comments and look forward to working together to ensure solar resources can play a major role in the Commonwealth's energy future.

Sincerely,

Eric Wilkinson
General Counsel and Director of Energy Policy
Environmental League of Massachusetts