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Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

SMART 400 MW Review & Expansion Proposal

It seems clear that the Department's intention is to steer development of new SMART projects to previously developed properties, but the proposed changes do not go nearly far enough to actually achieve that objective. Below are some suggestion on how to really make a difference in promoting solar on previous developed sites.

1. There needs to be a viable Behind The Meter ("BTM") option in order to realize the various BTM value streams, which can help compensate for the additional costs of siting solar on these types of properties.
2. While opening up AOBC to BTM systems is a good start, as it is currently proposed it is not enough.
3. For BTM system, AOBC must allow for monthly netting to actually be useful for BTM customers. Without netting projecting savings is impossible to confidently predict, which will inhibit customer acceptance and financing for such projects.
4. If enabling AOBC for BTM systems requires approval by the DPU, which could be a lengthy process, then the updated SMART regs should state that AOBC eligibility for BTM system will be available retroactively to system that come online prior to DPU approval of such changes, otherwise the BTM market will not move forward at all for the next 12-16 months (particularly in NGRID and WMECO territories).
5. The canopy and rooftop adders should be increased, as the costs of steel, foundations, and roof repairs are increasing, making it very difficult for canopy and rooftop projects to be feasible below Block 4 in any utility territory.

Independence Solar would like to thank the Department for its consideration of our comments.

Sincerely,

James Schwartz
Vice President
Independence Solar, LLC