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Ref: 400 MW Review Public Comments.

Dated 26<sup>th</sup> September 2019

Thank you for the opportunity to submit comments on the already hard work that has already gone into this document.

Page 5

“National Grid, Eversource West, and Unitil have Waiting Lists”

Eversource should be required to merge East and West Capacity blocks as required in D.P.U 17-140A order immediately.

Page 6

“Eversource East and West Large Capacity Blocks will remain separate and continue to accept applications through Block 8”

This is unfair on Eversource West. This means while it is agreeing with what I have said all along, but want to penalize Eversource West unfairly by only merging the capacity at the block nine rates and beyond, as an example a system Greater than 250 kW AC to 500 kW AC If you merged East and West today new projects would be in a combined block three. Eversource West would receive \$0.16460 per kWh, yet under the this review plan the same project but now in block nine would receive \$0.12369 per kWh a drop of \$0.04 or -24.85% per kWh. While at the same time Eversource East would be allowed to fill up their current remaining unfilled blocks. The approximate timeline would be at the end of 2020 to when the tariff would be updated and that's if Eversource does not object and just ignores the order as they did in order D.P.U. 17-140A.

Page 9

“Projects with all required application documentation dated as of the filing date of the regulation or earlier will be exempt from new land use requirements.”

As developer's have development projects and spend a lot of upfront money base on regulations this maybe hard.

“Behind the Meter (BTM)/ C & I Proposals Addressing Inequities”

As BTM systems have to be Net Metered and the Public caps are full, less Eversource East. Moving them to AOBC's make sense.

Also look at small and large capacity blocks. Should residential stay the same 25 kW and C&I should be increased to 60 kW for both capacity and AOBC's

On the capacity side 25 kW is too small in most C&I cases, so not worth doing under the Small capacity cap. But raising it to 60 kW would make smaller C&I projects more viable.

On AOBC's as limited to 25 kW to one C&I account due to having to paying two bills's to the EDC and one to the STGU owner it not worth the extra accounting paperwork for a business to do this. Change this to 60 kW as well.

Page 19 Low Income Participation

Both these

“Alternative models may include participation through an EDC established program

•Alternative models may also include participation through a community aggregation”

Would create less risk to the Developers so would encourage them to target this market.

But also look at requiring Eversource East and West to:

*“transfer alternative on-bill credits between NSTAR Electric Company service territory and Western Massachusetts Electric Company service territory While not now but set a time table to them to do this.as **administratively burdensome and costly** for Eversource to implement.”*

Should not be an excuse they can use for ever at the expense of the low income ratepayers. See below.

Information Request DPU-4-28 dated March 14<sup>th</sup>, 2018 (emphasis added)

*“Question*

*Refer to Exh. JDT-1, at 16 n.3, and NSTAR Electric Company and Western Massachusetts Electric Company, D.P.U. 17-05, at 55 (2017). Please confirm whether the statement regarding Eversource's inability to transfer alternative on-bill credits between NSTAR Electric Company service territory and Western Massachusetts Electric Company service territory is still valid.*

## *Response*

*The statement remains valid. Western Massachusetts Electric Company was consolidated into NSTAR Electric Company on December 31, 2017. However, the East and West portions of the NSTAR Electric Company service territory continue to be served by separate billing systems. The transfer of Alternative On-Bill Credits between East and West customers would be an entirely manual process that would be **administratively burdensome and costly** for Eversource to implement."*

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### "Solar + Storage Metering and Operational Changes Metering Proposal"

At this moment the EDC's are requesting more time to MOTION FOR EXTENSION OF TIME TO IMPLEMENT NON-BYPASSABLE SMART FACTOR in D.P.U 17-140. What seem to be the key to working this out is the make sure all the EDC's are on the same page as quickly as possible, i.e. when the program was rolled out all but one wanted to install meters and the other wanted the owner to install the meter. Just need to make sure that there is a clear path and message on this subject so everyone is on the same page.

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### "Public Off-taker Adder Changes"

"Of projects larger than 25 kW, only 2% of capacity to date is planning to utilize the Public Off-taker adder."

In Eversource West this is due to the waiting list and just not worth everyone time to look at systems till this get solved.

## Page 24

### "New Preferred Interconnection Adder/ Subtractor"

As long as the EDC's make this information publicly available. Also how would this work for holding the adder if applying for while a project is going thought the permitting/ interconnection approval process.

## Page 25

### "Strengthen Consumer Protection Standards"

May be look at taking an consumers bill and creating a simple formula take 24 months bills and divide by 2 to get an average year usage and then only allow up to say 80% of this amount to be allocated as AOBC's.

“Dual Use Agricultural Systems Updates”

While a hot issue and I think we have to think out of the box like with the next slide “New Pollinator Adder” is a great idea but the state wants to put solar on it other land and building yet when it comes to APR land it is not worth the time and effort to pursue a project i.e. I talked to a APR land owner who is a bee keeper and had a field with no tree clearing needed with access to the grid no abutters. A ground mounted system with wild flowers to create a habitat for the bees and would have taken a small part of the total land and would have provided to help keep this farm going. Yet as more than 200% of a farm’s electric load this is a nonstarter instead of everyone looking to create a bee habitat while only using a cleared small percentage of land to create solar as a pilot program to see how this would benefit everyone. The key thing is to look at the 200% rule and may add a percentage of the already cleared land i.e. up to 20%(input would be needed on this number) can be used for solar for both non APR and APR farmland.

I think the article below states it very well.

Posted Tuesday, September 3, 2019 3:39 pm in The Berkshire Eagle

MARLBOROUGH — This week, Gov. Charlie Baker's administration will unveil a new plan for solar energy in the Commonwealth and the details of the Department of Energy Resources' plan — known as the Solar Massachusetts Renewable Target, or "SMART" — will be closely watched by many stakeholders, most notably the Commonwealth's farm families.

That's because lease payments received for solar arrays have become an economic lifeline for Massachusetts farmers as they contend with a whole host of economic pressures pushing them closer to the brink. If the Baker administration wants to protect these farms and open space, the importance of allowing large-scale, ground-mounted community solar arrays in the new SMART plan cannot be overstated.

Massachusetts' agricultural industry relies on a partnership with the solar industry and it's easy to understand why. Small farms account for more than 94 percent of farms in Massachusetts and 8-in-10 are owned by individuals who are on average nearly 60 years old. Maintaining the open spaces that we all enjoy is a difficult task and the high value of farm land puts tremendous pressure on farmers to explore development options.

Meanwhile, the solar industry has become vitally important to Massachusetts' economy and needs room to grow. According to the Solar Energy Industries Association, solar energy currently generates 10 percent of electricity consumed in the Commonwealth, powering 428,000 homes. Today, Massachusetts has the third-largest solar workforce in the U.S. And in the last five years, the cost of electricity produced by solar energy has come down by a third.

These successes have made Massachusetts a national solar leader — a feat that would not have been possible without the cranberry farmers, dairy farmers and other farm land owners who host the cost-effective community solar projects that help expand solar access to homes and businesses that cannot otherwise access traditional rooftop solar.

Solar lease payments provide farmers a stable, secondary source of income that allows them to keep the farming operations on their properties financially viable. In fact, some of our members insist on making solar part of their farms because they feel it is the right thing to do as well as because community solar facilities often generate more revenue per acre than many of our traditional crops here in Massachusetts.

Solar farms are good for the broader Massachusetts' economy, as well. Each community solar project typically provides between \$4.5 million and \$7.5 million in economic benefits to the Commonwealth, from privately funded upgrades to the electric grid, to tax revenue to local municipalities to, of course, electricity savings to participating customers.

And unlike most commercial development, solar does not permanently spoil the land on which projects are sited. Solar arrays, once decommissioned, can be removed and the land converted back to its previous use with minimal effort. This is particularly useful for farmers looking to scale back production while ensuring the land can be farmed again and so preserved for future generations.

This partnership between community solar and farmers has been a tremendous benefit to Massachusetts — and those benefits should not stop now. With so much at stake for the economy, clean air and for our farming future, let's work together to protect community solar and the partnership critical to sustaining our family farms for the 21st century.

*Mark Amato is president of the Massachusetts Farm Bureau*

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“Adjust the definition of CSS and LICSS to allow for projects to participate through an EDC model or community aggregation. If such a model does not require customer contracts, no customer disclosure forms would be required.”

This is a great idea as towns with community aggregation are looking for ways to green up their supply and create direct local benefits to local projects which this would allow.

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“Late 2020-Tariff changes in effect”

This is too late for merging Eversource East and West which should have been done on September 26<sup>th</sup> 2018 and clearing the log jam

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“(f) Project Segmentation. No more than one **Building Mounted Generation Unit on a single building, or one ground-mounted** Solar Tariff Generation Unit on a single parcel or contiguous parcels of land, shall be eligible to receive a Statement of Qualification **as a Solar Tariff Generation Unit, with the exception of Building Mounted Solar Tariff Generation Units. No more than one Building Mounted Generation Solar Tariff on a single building shall be eligible to receive a Statement of Qualification.**”

So what happens if you in Eversource West you build a BTM Rooftop 24 Kw but once the log jam is removed you want to add another 200 kW to the system?

Should you have questions please reach out to me.

Respectfully

A handwritten signature in cursive script that reads "R. F. Hall". The letters are fluid and connected, with a prominent loop on the "H" and a trailing flourish on the "l".

Richard Hall