

SWEB Development USA, LLC  
209 West Central Street, Suite 306  
Natick, MA 01760

September 27, 2019

Commissioner Judith Judson  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02116

**RE: Comments regarding SMART 400MW Review**

Dear Commissioner Judson:

SWEB Development USA, LLC (SWEB) is pleased to submit these formal comments in response to DOER's 400 MW Review of the Solar Massachusetts Renewable Target (SMART) Program.

Good Cause Extension Revision and Mechanical Completion Clarity

In the regulations, it states that projects must be Operating within 12 months of their receipt of the Preliminary SQ. However, there is the option for a 6-month Paid Extension for Fee, giving projects a total of 18 months to come online. While planning our project's construction schedule and timelines, SWEB has found that there will be significant delays to projects coming online due the National Grid Cluster Study and other delays by EDCs. These delays go well beyond the 18-month timeline laid out by the DOER.

Having projects which are mechanically complete but not operating would place substantial unnecessary economic and logistic burdens on Projects and grid as equipment will degrade. The solution to ensure that this equipment continues to function well would be to bring a generator to site every so often to cycle power and heat up our equipment. This is not an ideal solution as it not only adds additional financial and resource-intensive pressures to projects, but it is also counter-intuitive to what the SMART program hopes to achieve.

All major equipment will also require recommissioning works and testing which will also draw further power from the grid. After the commissioning and testing, if the project does not produce power, a battery will have to be kept charged in the logic controller, or the unit will have to be recommissioned as the programming will be lost after such a long period of time. Each test or recommission draws more power from the grid.

**SWEB believes that the Extended Reservation Period Pending Authorization to Interconnect (ATI) should be revised to allow all projects with the ISA construction timeline longer than 18 months to not have to be mechanically complete until the defined date for ATI is provided by the local Electric Distribution Company (EDC). To ensure that projects are serious, this revision will only apply to project that have both initiated Start of Construction and made the initial payment of 25% for interconnection or paid the Detailed Study fee to the utility.**

Further to this thought, SWEB is aware that there is an Extended Reservation Period Pending Authorization to Interconnect (ATI). However, to receive this extension the project would have to be mechanically complete and. **SWEB seeks greater clarity as to what is meant in the regulations as being mechanically complete prior to ATI.**

### Rates of later blocks & Greenfield Subtractor

SWEB has found that projects in Block 5 and onward become incredibly difficult to construct due to the increase in Interconnection costs. The economic outlook of the projects in later blocks are further strained by the delays from the EDCs. Furthermore, these significant delays from the EDCs have hurt the financing ability of the projects as well. **SWEB believes that the ideal solution to maintain economic project viability would be to lower the rate decline in Blocks 5-8 to 1%, and then keep the rates between Blocks 9 -12 constant.**

Moreover, the greenfield subtractor does not help the rate issue in the later blocks, **SWEB recommends that the DOER keep the greenfield subtractor rate as is.** Making it larger would only add additional economic and financial pressure to already stressed later-block projects.

### Projects over 500 kw are required to have energy storage

Many of SWEB's projects have received their required non-ministerial permits from the appropriate Municipalities and have land control. However, due to the National Grid Cluster study, and other EDC delays, our projects have not received their Interconnection Service Agreements, despite some having already started their System Impact Studies. We believe that there are many other projects across the Commonwealth that are in this situation.

Adding energy storage to projects which were permitted without storage and have their land control based on a certain footprint will require a resource intensive series of project re-permitting and will put undue hardship on Municipal boards and committees. Furthermore, some projects will be completely voided or lose a significant amount of capacity as the project footprint without energy storage is quite tight to avoid issues with contiguous parcels, or to fit with the local Municipal bylaws.

Additionally, adding energy storage to projects, especially those already in the system impact study stage, will cause even further delays and complications with local EDCs and Interconnection Service Agreement timelines. SWEB believes that forcing energy storage on projects which have been in the interconnection queue for over a year would only delay projects and create an even larger "rush/influx" of projects into the SMART Program at a later date.

**SWEB believes that projects which can prove significant or advanced development through both proof of land control and non-ministerial permits dated before December 31, 2019 should be grandfathered into the original SMART Program regulations and should not be forced to add energy storage.**

### Interconnection Adder/Subtractor:

While SWEB understands the reasoning behind why the DOER would like to implement an Interconnection Adder/Subtractor, there are many issues that would arise from such a targeted approach to interconnection.

Firstly, many of the areas where interconnection is ideal is incredibly difficult, if not almost impossible to permit with the Municipality.

Secondly, many of the "cold zones" for interconnection would likely have very high interconnection upgrades due to the lack of physical grid presence.

Thirdly, many of these “cold zones” do not have suitable land for project development.

Finally, in addition to the high interconnection costs, land siting, and permitting difficulties in some of the designated “cold-zones”, SWEB believes that some of these areas with Interconnection Adders will become a “breeding-ground” for projects and will cause Municipalities and EDCs to be over-run in these areas, therefore creating the exact effect the DOER wishes to mitigate.

**SWEB believes that a much more thorough analysis of this potential adder/ subtractor needs to be conducted and compared to land siting, local municipal bylaws, and physical grid availability across the Commonwealth.**

Thank you for your continued effort on the SMART Project and solar in Massachusetts. We appreciate the opportunity to provide these formal comments and hope you will take them under serious consideration. If there are additional questions or clarifications needed, please reach out to [sarah.rosenblat@sweb.energy](mailto:sarah.rosenblat@sweb.energy) or to 774-526-0834.

Kind regards,



Rory Cantwell  
Chief Business Development Officer  
SWEB Development USA, LLC



Sarah Rosenblat  
Development Manager  
SWEB Development USA, LLC