



SunRaise Investments, LLC
26 Market Square
Portsmouth, NH 03801

September 27, 2019

Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
Attn: Kaitlin Kelly

Re: SMART 400 MW Review Public Comments

On behalf of SunRaise Investments, LLC (“SunRaise”) please find our public comments on the SMART Program 400 MW Review (the “Review”). SunRaise appreciates the opportunity to comment and would like to thank the Department of Energy Resources (“DOER”) for its continued efforts in developing and operating the SMART program.

Areas of support

To begin with, SunRaise specifically supports the following areas of the Review.

- ❖ Slide 6: The overall program expansion of 800 MW (the “Program Expansion”), and we support an increase beyond the expanded 800MW.
- ❖ Slide 10: Locational Based Adders remaining at the \$/kWh levels initially set
- ❖ Slide 21: Both the AC and DC metering proposals
 - One exception to the DC metering proposal is included later in the comments.
- ❖ Slide 25: The Consumer Protection Standards
- ❖ Slide 28: The Pollinator Adder
- ❖ Slide 30: Community Shared Solar eligibility updates, specifically:
 - No requirement to provide Customer Disclosure Forms for anchor tenants, and
 - Adjusting definitions to allow for projects to participate through an EDC model or community aggregation.
- ❖ Slide 35: Adding Floating Solar and Canopy STGUs to Category 1 qualification

These proposed aspects of the Program Expansion are logical, well-researched and well-thought out and, in the opinion of SunRaise, should be included in the Program Expansion emergency regulation to be filed by DOER without further edits.

Areas of non-support and comment

There are several aspects of the Review that SunRaise either does not support or would like to offer its suggested modifications. We believe that through these suggestions and comments, and those filed by The Solar Energy Industries Association, the Coalition for Community Solar Access, MassSolar, the Northeast Clean Energy Council, the Solar Energy Business Alliance of New England, and Vote Solar (the “Solar Commenters”), the SMART program will continue to succeed

and contribute to the solar, clean energy, and climate change mitigation goals of the Commonwealth and the Baker – Polito Administration.

1. Future capacity blocks should decline at 2% as opposed to 4% for all STGUs.

SMART capacity blocks have filled up far more quickly than anticipated and as a result the \$/kWh block rates have dropped more quickly than the drop in solar component costs over the same period. This results in a significant financial impact for those projects with SMART allocations in later blocks, or in program expansion blocks. Those applicants are paying a similar cost for their projects as those in earlier blocks but are receiving a proportionally smaller incentive rate to cover the cost. The percentage decline between blocks is a logical aspect of the program but the unforeseen rate of block allocations requires an adjustment of the rate of decline. SunRaise supports a 2% decline for both stand alone and behind the meter systems for the program expansion.

2. Combining the Eversource block capacity should occur later in the program expansion.

SunRaise does not support the combination of the block capacity for Eversource East and West post block 8 and would instead offer a compromise that the block capacity be combined for blocks 11 and 12 only, but not for blocks 9 and 10. The general reason for this is that Eversource East is clearly where there is more substantial load on the regional grid and in combination with the fact that there is a substantial amount of proposed DG projects stuck in Eversource's queue then to expand SMART by 800MWs seems only right to associate some of that expansion to Eversource East capacity.

3. The subtractor increase of 5x for Category 2 and 3 projects would significantly harm DG development

SunRaise does not support the significant, five fold increase, in the subtractor for Category 2 and Category 3 Land Use projects. Data to warrant such an increase does not exist or has not been presented and such an increase would harm development of DG projects, which would hamper the ability of the Commonwealth to reach its clean energy goals and milestones. Any increase in the subtractor should apply only to the program expansion (i.e. post block 8 in each service territory) and any such increase should be backed up by data showing that SMART projects are having a material impact on open space. Moreover, we are strongly opposed to modifying the Categories from where they are now to projects located on agricultural land that do not qualify for the adders.

4. Do not remove the exemption for projects complying with local solar zoning

SunRaise is not in support of the aspect of the Review indicating that projects complying with local zoning rules or projects that are in a solar overlay zone would be subject to the Category 2 subtractor. Local governments make decisions regarding zoning bylaws, approval for solar projects, and solar overlay districts/zones that incentivize siting of solar projects in specific areas. This proposed removal of the exemption for project complying with local solar zoning would penalize projects that are complying with the decisions of local governments and would undermine the intent of zoning rules across many municipalities. This is a founding principal of Massachusetts' Home Rule. SunRaise urges the DOER to remove this change from the Program Expansion.

5. DC Metering discount rate should be 2% instead of 3%

SunRaise supports the concept of the discount rate for measuring solar production for DC coupled projects on the DC side of the inverter, but proposes that the discount rate be set at 2% rather than the 3% rate included in the Review (slide 21).

6. The introduction of the undefined “Interconnection Adder/Subtractor” should be removed from the program expansion

SunRaise proposes the removal of the new Interconnection Adder/Subtractor concept from the Program Expansion. This concept currently has no values, proposed requirements, or definitions and does not have a clear rationale for being included in SMART. The DG interconnection process that SMART projects must follow already incentivizes development in areas closer to load with less DG congestion and dis-incentivizes development in areas of high DG penetration with low load. Projects in the more highly congested areas generally pay higher system modification costs (subtracting value from the project) and projects in the areas of low DG congestion pay lower costs (adding value to the project). This Adder/Subtractor concept does not provide any additional value to the process of incentivizing development in low DG penetration areas and has not been presented with any evidence that would indicate the opposite. Furthermore, this is a very technical issue and should be handled with much analysis by many stakeholders, as it is currently being handled under DPU docket 19-55. The issue should remain within DPU 19-55 and does not have a place in the SMART program. Additionally, this mechanism would deter development from areas that may be ideal land use siting areas and could result in many projects receiving a land use adder *and* an interconnection subtractor which does not seem to be the intent of the SMART program.

7. Strengthening Consumer Protection Standards (Three Strikes, You’re Out)

SunRaise supports the concept of strengthened consumer protection standards (slide 26) and it further would encourage DOER to open a discussion on this topic so it is effectively implemented into the SMART program. For the purposes of fairness, SunRaise proposes that a “strike” be taken back if the error is found to *not be the fault* of the applicant (i.e. incorrect information provided by an off-taker, by a Community Shared Solar aggregator, by the utility, etc.) so that applicants are not unfairly penalized for issues outside of their control.

8. Demonstrating compliance with the CSS Adder when operational

SunRaise is in support of the following change (Slide 30) “Applicants that reserve the CSS Adder must demonstrate compliance with the adder when operational

- Applicants that do not may lose their queue position
- DOER will offer a period after implementation of rule when projects may remove CSS Adder with no consequence”

This will ideally limit the number of applicants that select the CSS Adder at the time of reserving their SMART qualification who do not have any plan or intent of pursuing CSS for their project. Thus, it should limit the projects in the CSS Tranches to those that intend to participate in CSS. However, there should be an exemption to losing queue position for *good cause* in the event the

removal of the CSS Adder for a specific project is not the fault of the applicant or in the event it occurred for a *reasonable* reason.

Conclusion

Thank you for the opportunity to comment on the Review and the Program Expansion. We look forward to collaborating with DOER and SMART stakeholders on this topic further and are happy to be contacted regarding any questions DOER may have on these comments.

Thank you,

A handwritten signature in black ink, appearing to read "Matt" followed by a stylized surname.

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