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Mr. Eric Steltzer  
Director – Renewable and Alternative Energy Division  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Re: SMART ASTGU Guideline Comments

Dear Director Steltzer:

Prior to finalizing the proposed changes to the ASTGU Guideline, please answer the following questions:

- Why has the Straw Proposal removed many of the changes to the technical and application requirements that were proposed in October 2019?
  - Who drafted the original October 2019 language and what was the basis of those recommendations? What has changed and why?
- Why has ASTGU size been increased from 2 MW AC to 5 MW AC?
  - Who specifically made that decision? What was the basis of the decision to increase project size from the October 2019 proposed 2.5 MW DC to 5 MW AC with a DC Cap of 125% of AC or 6.25 MW DC?
- What agriculturally based evidence and proven results supports the proposed changes to the Guideline and the increase in size to 5 MW AC?
- Why are there no yield requirements in the Straw Proposal? No yield requirements suggest the following:
  - The SMART Program regarding ASTGUs is a sham and solar power generation and not agriculture will be the primary activity on the land where installed.
  - Without a yield requirement, there is no objective agricultural measure to remove a project once built.

- Because no long-term studies have been done, UMass Agricultural Extension has no idea if any of this will work. Therefore, the people of Massachusetts will pay for the errors of the Baker Administration, the DOER and UMass.
- Why has the DOER not required long term studies to determine the efficacy and impact of ASTGUs prior to approval of proposed projects that may span 30 years?
- Regarding ASTGUs with cranberries, as you know, no long-term studies have been done to show that solar develop over cranberries will work. The Carver plywood experiment, lasting only a few months in 2019, was inadequate, as independent experts have stated. (See attached letters of Professors Vorsa and Roper)
  - Why has the DOER taken no action regarding the proposed long-term study recommended by Professor Roper? (See attached Roper proposal outline)
  - Why hasn't the DOER required solar development companies that wish to develop solar over cranberries to fund a 3 to 5-year study, as recommended by impartial experts, to prove the concept works before implementing 30-year unproven experiments?
  - By not requiring a 3-5 year study prior to approving these projects, this suggests the main purpose is solar development and not continued agricultural use as claimed.
  - What percentage of cranberry farmers considering solar development on producing bogs are attempting to utilize the SMART program as a method of selling out and paying for their retirements as opposed to the promoted claim of continued agriculture being the priority?
- Why hasn't the DOER notified Massachusetts Towns that their large-scale solar bylaws must be amended to allow battery energy storage systems? As you know, large scale battery energy storage systems have not been historically used, and are not necessary, customary, or typical in Massachusetts solar projects. Edicts requiring them from the Baker Administration and unelected regulators will not pass Constitutional review.
- Why hasn't the DOER notified the people of Massachusetts of the dangers involved with these battery storage systems, including the risk of thermal runaway and the threat to soil, water, and air from the hazardous materials in their components?
- Why hasn't the DOER prohibited battery energy storage systems in aquifers, areas of critical environmental concern, well protection zones and flood plains? Where is the Baker Administration's and the DOER's concern for the environment?
- Since most agriculture is located in residential areas, why is the Baker Administration and the DOER supporting development of large-scale solar power plants in residential areas in violation of historical zoning for use and without taking into account the future problems being created by poor energy policy decisions?

- Why does the Baker Administration and the DOER continue to promote subsidized large-scale solar development in residential areas, when the present solar and battery technology requires further development and research to be market ready and safe? If present solar technology worked, subsidy would not be necessary.
- What is the total cost of the SMART program and the ASTGU policy to the people of Massachusetts?
- Who is benefiting financially from the SMART program and ASTGU policy?
- What are the impacts from proposed projects using the SMART program and ASTGU policies to the taxpayers, residents, and the environment? Claims of solar being an alternative to fossil fuels must be weighed against cost and negative impact to the people and the environment.
- According to the US Energy Information Administration, the average retail cost of electricity in cents per kw hour in the US is 10.53 cents. Massachusetts average retail cost is 18.5 cents or the 3<sup>rd</sup> highest in the nation after Hawaii and Alaska.
  - How much of the average cost difference is due to the Baker Administration's alternative energy programs?
- What responsibility will the Baker Administration and the DOER assume for hazards to communities from a battery storage system catastrophe? For example, contamination to well water supplies in residential agricultural areas.
- What have you learned from the problems that California has encountered with their renewable energy programs and what changes are you making to address those concerns with the ASTGU policy proposed in this Straw Proposal?

While I support solar research and development, it appears the so called SMART Agricultural Solar Tariff Generation Units Guideline Straw Proposal was drafted to provide increased subsidized windfall benefits to solar developers and certain landowners, but not to the people of Massachusetts.

Very truly yours,

*Joseph Cogliano*

Joseph D. Cogliano, Jr.

Enclosures: Professors Vorsa & Roper Letters; Professor Roper Study Outline