

## Barnicle, Abby (ENE)

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**From:** Kris Pitney <kris.pitney@pacificoenergyna.com>  
**Sent:** Thursday, October 1, 2020 11:51 AM  
**To:** DOER SMART (ENE)  
**Subject:** SMART ASTGU Guideline Comments

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Hello,

Please see our comments below on the ASTGU straw proposal dated 09-17-20.

On slide 4, relating to the sizing requirements:

- On the first bullet on this slide, the size limits (2 MWac versus 5 MWac) seem unclear. Our understanding is that under the current guideline (released 04-25-18) sites can only have 50% sunlight reduction (section A.2) and shall be limited to 2 MWac in size (section A.4). Therefore, it is not clear under what circumstances a developer could install a 5 MWac system. Is the proposed change intending to state that systems between 2 and 5 MWac may qualify provided that the system occupies no more than 50% of the available farmland, and that this restriction, if more stringent than the 50% sunlight reduction restriction, shall apply for systems of this size?
- In the last bullet on this slide, the proposed DC-AC ratio of 1.25 will limit efficient inverter sizing, and it will also severely limit the ability to install a DC coupled energy storage system on these types of projects. We would propose limiting the overall DC nameplate rating of ASTGUs, and letting developers determine their own optimal DC-AC ratios. While we recognize the need to limit the amount of energy produced under the ASTGU program (and hence some sort of cap), we believe that doing so thru a limit on the DC to AC ratio will result in unnecessarily inefficient and underutilized systems. If the DC-AC ratio must be used as the cap mechanism for the program, we would propose a much higher ratio.

Thank you for taking the time to review our comments, and please let me know if you have any questions on them. We believe the ASTGU program is a good and important program, and look forward to any improvements that may be made to it.

Regards,

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