

Commissioner Patrick Woodcock
Massachusetts Department of Energy Resources
100 Cambridge Street
Suite 1020
Boston, MA 02114

via email: DOER.SMART@mass.gov

October 30, 2020

Re: Comments on the Proposed Agricultural Solar Tariff Generation Unit Guideline Changes

Dear Commissioner Woodcock:

Thank you for the opportunity to comment on the proposed changes to the SMART Agricultural Solar Tariff Generation Unit (ASTGU) guidelines. We applaud the Department of Energy Resources (DOER) for incorporating the ASTGU option into the SMART program and believe that dual-use projects will have incredibly positive impacts on the Commonwealth and help the Commonwealth to achieve several of its most critical goals: greater deployment of solar energy generation and energy storage, revitalizing and protecting agricultural communities, and minimizing land use impacts associated with renewable energy development.

NextSun participated with a group of conservation organizations, farming organizations, solar energy advocates and solar developers to develop joint comments being submitted by the American Farmland Trust (AFT). NextSun strongly supports the joint comments and submits the following additional comments:

- NextSun supports the size limitation proposed in the AFT joint comments of 7.5MW DC, without any associated MW AC, DC:AC ratio, or eligible farmland restrictions.
- The newly proposed restrictions (i.e. the 125% DC:AC ratio limitation and the 50% of eligible farmland cap) are arbitrary, unjustified and will unnecessarily prevent farmers from being able to participate in the ASTGU program.
- The 50% of eligible farmland limitation disproportionately impacts small farms and smaller scale projects, making it more difficult for small farms to take advantage of the ASTGU program. Given the increasingly higher interconnection costs that are prevalent throughout the Commonwealth, larger project sizes are many times necessary in order to overcome these fixed costs.
- The DC:AC ratio limitation also inhibits the viability of ASTGU projects, especially given the requirement for energy storage on projects 500kW or greater. Imposition of a DC:AC limitation would be highly problematic and work against the goals of the Commonwealth. The limitation prevents an optimized solar+storage design, making projects less economically viable, and at the same time discourages the deployment of greater amounts of energy storage, which the Commonwealth is actively seeking.
- The 7.5MW DC cap proposed in the AFT joint comments, without any other restrictions, allows projects to be flexible with DC:AC ratios in order to optimize a solar+storage

design, allows projects to most efficiently utilize available interconnection capacity and does not disproportionately impact smaller farms.

- If DOER does choose to maintain any of the newly proposed project size restrictions, a “grandfathering” clause must be implemented for projects that applied for interconnection prior to the revised guidelines taking effect. Developers and farmers relied on the ASTGU Guidelines released in April 2018 (30 months ago) to make project design decisions and substantial development investments. The newly proposed project size restrictions would be devastating to many of these projects and would unfairly penalize developers and farmers who were early adopters of the ASTGU program. For example, a project that applied for interconnection in 2018 with a 2MWAC cap (based on the April 2018 ASTGU Guidelines) is greatly disadvantaged compared to a project that is designed with a 5MWAC cap under the newly proposed guidelines.

Thank you for your consideration of these comments.

Sincerely,



Adam Schumaker
VP, Development
NextSun Energy LLC