



October 30, 2020

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

RE: SMART Program ASTGU Straw Proposal (*via email to DOER.SMART@mass.gov*)

Dear Commissioner Woodcock,

On behalf of the Cape Cod Cranberry Growers' Association (CCCGA), I am pleased to offer comments regarding the Agriculture Solar Tariff Generation Unit guidelines straw proposal for the SMART program. We applaud a process that provides as much transparency and consistency as possible in the development of agricultural dual-use solar projects, for the benefit of the farming community, as well as attaining the climate goals of the Commonwealth. Dual-use solar (as well as conventional arrays on adjacent agricultural land) provides an opportunity for many cranberry growers to consider as a means to diversify their income and keep their farm sustainable. The ASTGU guidelines by and large provide that opportunity.

Technical & Application Requirements

We support maintaining the technical requirements in the original guidelines. These recommendations provide a straight-forward process that growers can plan for when designing solar projects and evaluating crop needs, both in terms of growing and harvesting. However, we also encourage a level of flexibility in system design, particularly regarding sunlight and shading by crop type. By allowing for a degree of design creativity that still maintains the integrity of the program and the best crop harvest potential, augmented with what is expected to be more data driven by successfully permitted projects, the scope of some of the technical requirements may change over time. If there were a mechanism to allow for such design creativity, it would provide a better product for achieving the goals of all stakeholders.

Further, project proposals should be encouraged and supported that have an embedded research component included as part of the design that provides more data in understanding the needs of the crop under the panels. There is a great opportunity to simultaneously permit projects that also provide much needed data for establishing crop specific criteria.

Application & Approval Process

We support the proposal to develop a third-party certification approval process. This can provide an efficient approval mechanism by an organization with a thorough understanding of agriculture and sensible solar design. In developing such a process, it is imperative that a broad coalition of stakeholders be involved to provide input, in order to best position a model for success.

Cape Cod Cranberry Growers' Association

265 South Meadow Road, Unit 2D ● Plymouth, MA 02360
Telephone: (508) 866-7878 ● Facsimile: (508) 866-4220
Email: cccga@cranberries.org ● Web: www.cranberries.org



Project Size

We respect the Commonwealth's concern over the size of projects, particularly in the early stages of the SMART program. However, we want to ensure that farmers are given a fair opportunity to entertain solar projects that will make viable economic sense. Size limits are understandable, but it is suggested that a level of flexibility be considered, which may be beneficial for small farms or crops with less defined growing spaces, such as cranberries. There have been comments made by some regarding the ASTGU straw proposal for consideration of a larger cap size. Such creativity may afford the opportunity for more farmers to participate in dual-use ag and for the Commonwealth to attain the ambitious yet laudable, renewable energy targets. A working group may be helpful to further consider or refine project size considerations.

Grandfathering

Because there are many projects already going through the approval process and certainly at a point where significant resources have been spent in design and permitting, it's imperative that a grandfathering mechanism be put in place to protect these projects. Similar to the grandfathering provision of the SMART regulations, a process that recognizes the changes in the ASTGU is needed to protect those growers already deep into the process.

Conclusion

We thank DOER for the opportunity to comment on the ASTGU straw proposal. Please contact me with any further questions at 508-866-7878 or bwick@cranberries.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian A. Wick".

Brian A. Wick
Executive Director

About CCCGA:

CCCGA represents more than 325 cranberry growers in Southeastern Massachusetts, Cape Cod and Nantucket. Cranberries are the largest agricultural food commodity produced in the state with an annual crop value of \$60.2 million dollars. Massachusetts is home to 30% of all cranberry acreage and according to the most recent Farm Credit East Knowledge Exchange Report, provides more than 6,900 jobs and a total economic benefit of over \$1.4 billion to the Massachusetts economy.

Cape Cod Cranberry Growers' Association

265 South Meadow Road, Unit 2D • Plymouth, MA 02360
Telephone: (508) 866-7878 • Facsimile: (508) 866-4220
Email: cccga@cranberries.org • Web: www.cranberries.org