

## **Barnicle, Abby (ENE)**

---

**From:** Brad Mitchell <brad@mfbf.net>  
**Sent:** Tuesday, November 5, 2019 5:16 PM  
**To:** SMART, DOER (ENE)  
**Cc:** Kjellberg, Scott (ENE)  
**Subject:** Agricultural Systems Guideline Comments

November 5, 2019

Commissioner Judith Judson  
Massachusetts Department of Energy Resources  
100 Cambridge Street  
Suite 1020  
Boston, MA 02114

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

Dear Commissioner Judson:

The Massachusetts Farm Bureau Federation is the largest farming organization in the Commonwealth with approximately 6,000 member families. It is on behalf of these members that we would like to provide comment on the proposed changes to Agricultural Solar Generation Tariff Unit (ASGTU) guidelines.

We appreciate DOER's efforts. However, the proposed changes are very concerning to the agricultural community. It is our opinion that they are far too prescriptive, and much more complicated than necessary. We would strongly suggest that DOER take a more qualitative than quantitative approach to the approval of dual use proposals.

Dual use is a relatively new concept and as such any guidelines should encourage innovation. As proposed, the guidelines will restrict innovative proposals. Sunlight and yield requirements should not be assigned percentage requirement or otherwise be subject to prescription. Rather, they should be considered on case-by-case basis against a criterion of:

1. Is the proposed agricultural component of the dual use a commercially valid agricultural activity;
2. Will the proposed use will aid in the overall sustainability of a working farm?

It is important to keep in mind that solar installations are not permanent and once removed the land can once again revert to full agricultural use. In some cases, it will make sense to sacrifice agricultural productivity for other sources of income when markets or conditions on the farm favor another use. For instance, given the cranberry market, it is desirable to cut production considerably for the near future. A dual use proposal on a cranberry bog for instance, should be evaluated against the realities of the market and the needs of the operation.

We would suggest that the approval process include review and recommendations of advisory committee consisting of representatives of the agricultural, solar and land use sectors. The various perspectives and expertise of such representatives would be of significant benefit in a case-by-case approval process of proposed dual use projects. Held to the two-part criteria suggested above, we believe this would address concerns with the "agricultural validity" of proposed projects, without unduly restricting innovative projects.

In addition, we would ask that DOER reconsider the proposed 2.5MWDC cap. This restriction would result in many dual use projects being economically infeasible. Again, we would suggest that the size of the solar component of the proposal be held against the dual criterion suggested above.

Thank you for your consideration of our comments. If we can be of any assistance, please do not hesitate to contact us.

Contact

Brad Mitchell

Deputy Executive Director

617.413.3727

[brad@mfbf.net](mailto:brad@mfbf.net)