

# Commonwealth of Massachusetts Executive Office of Energy and Environmental Affairs

## **Solar Industry Summit**

September 29, 2025







Timing	Торіс		
9:00	Check-In and Networking		
9:30	Introductions & Welcoming Remarks		
9:35	Solar Industry Policy Priorities [Open to Press]		
9:50	Conclude Open Discussion   Media Clearing		
9:50	Structured Conversation w/ Governor re: Policy Priorities [Closed to Press]		
10:10	Structured Conversations Continue [Governor & Secretary to depart]		
10:35	10-minute Break		
10:45	Agency Staff Present on Current Initiatives (SMART, DOER grant programs, Solar for All, Net Metering Rulemaking, IIRG Petition, CIP Proceedings, LTSPP, Permitting Reform)		
11:15	Structured Discussion and Q&A of Current Initiatives and Priorities		
11:45	Lunch Break		
12:30	Additional Ideas for Discussion		
1:00	Break Out Groups Discuss Prioritization of Issues		
1:30	Eversource Presentation		
2:00	Discussion of Utility Ideas		
2:20	Wrap up and Next Steps		
2:30	Adjourn		



## **Roundtable Discussion**



# **Agency Updates**



## **Solar Policy Updates**

**Massachusetts Solar Summit** 

September 29, 2025

Presented by

Samantha Meserve
Director, Renewable and Alternative Energy Division



### Solar Massachusetts Renewable Target (SMART)

#### **Key Elements**

- Adjustable structure to quickly respond to market conditions
- Uncapped residential capacity
- Expanded locational based adders to support built environment projects
  - Large Building Mounted
  - Raised Racking
- Mitigation Fee for ground mounted projects
- Implementation of an Environmental Monitor
- Increased savings minimums for residential customers

**Next steps:** Tariff proceeding at the Department of Public Utilities likely to commence Fall/Winter 2025.

#### **Program Year 2026**

- DOER will release the draft PY26 Annual Assessment on October 1<sup>st</sup>
- Public comment on the report will be collected through 5pm on October 31<sup>st</sup>
- DOER will release the final PY26 Annual Assessment on December 1<sup>st</sup>

#### **Applications Open October 15<sup>th</sup>!**

- DOER will begin collecting SMART 3.0 applications on October 15<sup>th</sup>
- All applications received within the first 10 business days will be sequenced by ISA Application Date
- Following the initial 10 business days, applications will reserve capacity on a first come first serve basis



### **DOER Ongoing and Upcoming Grants**

#### **Low-Income Services Solar Program (LISSP)**

- Established by Mass. Gen. Laws Chapter 29, Section 211111
- Funded by the MA Legislature and DOER
- Supporting solar and battery storage deployment for non-profits located in and serving Environmental Justice Populations
- \$5,650,000 total program budget
- Awards will cover up to 100% of project costs depending on system design
- Applications open on October 1, 2025
- LISSP Program Webinar will take place on October 2, 2025

#### **Leading by Example Solar-Decarbonization Grant Program**

- Supporting new state solar PV deployment, battery energy storage, electric vehicle charging, and decarbonization efforts
- \$25 million total program budget, \$2.5 million maximum award
- Applications are currently open until June 30, 2027

#### **Solar for All**

- EPA officially terminated Massachusetts Solar for All award on August 7<sup>th</sup>
- DOER continues to coordinate with the Governor and Attorney General's Office regarding next steps with Solar for All.





# Massachusetts Department of Public Utilities ("DPU")

Pending and Forthcoming
DG Proceedings



### **DPU Mission Statement**

The DPU is an adjudicatory agency overseen by a three-member Commission. It is responsible for oversight of investor-owned electric power, natural gas, and water utilities in the Commonwealth. In addition, the DPU is charged with developing alternatives to traditional regulation, monitoring service quality, regulating safety in the transportation and gas pipeline areas, and the siting of energy facilities. The mission of the DPU is to ensure that consumers' rights are protected, and that utility companies are providing the most reliable service at the lowest possible cost. The DPU oversees the public safety from transportation and gas pipeline-related accidents, and the energy facilities siting process. The DPU seeks to promote safety, security, reliability of service, affordability, equity, and greenhouse gas emission reductions.



# **Net Metering**

- <u>D.P.U. 23-140-C</u> (issued September 12, 2025)
  - DPU's Order clarifying eligible facility configurations following a joint request from the three EDCs
  - the DPU held that:

"all capacity behind a single retail meter and interconnection point, regardless of SMART Program participation or whether the capacity was installed in phases over time, constitutes a single facility for the purpose of Net Metering eligibility, consistent with the SPR and past precedent."



## **SMART 3.0**

- EDCs' Tariff filing is forthcoming
- DPU is keenly aware of the need to provide certainty on this matter as soon as practicable.



# IIRG DG Interconnection Tariff Revisions Proposal

- Pending, NOI, docketed as <u>D.P.U. 25-48</u>
- Technical Conference held on September 24th, further consensus reached in several areas
- Consideration of two discrete, consensus topics on an accelerated timeline:
  - (1) revise the threshold for the DG Interconnection Tariff for Simplified Process eligibility from 15 kW to 25 kW; and
  - (2) establish a Group Study Exemption for certain Expedited Process facilities
- Upcoming procedural milestones:

Deadline for Department to request additional information following the Technical Conference
Initial Comments on DCAMM Requests Due
1
Reply Comments on DCAMM Requests Due



# National Grid Tariff Waiver Proposal

- Pending proceeding, Docketed as <u>D.P.U. 25-119</u>.
- Waiver request from provisions of the DG Interconnection Tariff, M.D.P.U. No. 1599, and Provisional System Planning Tariff, M.D.P.U. No. 1577, applicable to the interconnecting customers in the Capital Investment Project ("CIPs") in the Department's Order in D.P.U. 22-170 (Monson-Palmer-Longmeadow), D.P.U. 23-06 (Gardner-Winchendon), D.P.U. 23-09 (Barre-Athol), and D.P.U. 23-12 (Spencer-Rutland).
- Per proposal, extended payments must be secured by an irrevocable letter of credit in a form satisfactory to the Company to protect the Company and distribution customers against the risk of nonpayment of any milestone payment.
- Option to pay 75% CIP Fee installments according to:

Milestone	<u>% Due</u>
Construction Start (Distribution line)	25%
Construction Start (Substation)	25%
Construction Midpoint	25%

<sup>\*</sup>Rather than 75% of CIP Fee payment due within 120 Business Days after the earlier of the Interconnecting Customer's execution of their ISA or their first 25% installment payment.

• Comment period ended September 4th, DPU to issue next steps in the very near term.



# National Grid CIP Supplemental Filings

- D.P.U. 23-06 (Gardner-Winchendon) and D.P.U. 23-12 (Spencer-Rutland)
- Conditionally approved CIPs, adjudicatory proceeding, process limited to intervenors
- Supplemental filing made by National Grid on September 8<sup>th</sup> indicating >50% original Group Study capacity had withdrawn from the queue and arguing good cause to move forward.
- Comment deadline was September 26<sup>th</sup>, however, pending motion to extend the deadline to October 3<sup>rd</sup>.



## **Pending CIPs**

- National Grid: <u>D.P.U. 25-31</u> (Monson-Palmer-Longmeadow (NW))
  - Motion to dismiss filed by Intervenor ZP Battery; DPU to rule in the near term
- NSTAR Electric: <u>D.P.U. 25-30 (Southwick-Granville)</u>, <u>D.P.U. 25-81 (New Bedford)</u>, <u>D.P.U. 25-82 (Dalton-Hinsdale)</u>, <u>D.P.U. 25-83 (Gill-Montague)</u>
  - Adjudicatory proceedings, Parties established, <u>Joint Procedural Schedule</u> established on September 25<sup>th</sup>



# Long Term System Planning Process ("LTSPP")

- Docketed as D.P.U. 25-20
- Adjudicatory proceeding, Parties established
- Order on scope of investigation is forthcoming



## **DPU Resources:**

- Who to contact about my renewable energy question or concern webpage
- DG and Clean Energy Ombudsperson's Office: <a href="mailto:dpu.ombudsperson@mass.gov">dpu.ombudsperson@mass.gov</a>
- Net Metering and DG Inquiries: <a href="mailto:dpu.netmetering@mass.gov">dpu.netmetering@mass.gov</a>
- Electric Power Division ("EPD"): <a href="mailto:epd.filing@mass.gov">epd.filing@mass.gov</a>
- Clean Energy and Resilience Engineering Division ("CERE"): <a href="mailto:dpu.cere@mass.gov">dpu.cere@mass.gov</a>
- To be added to DPU's electronic DG service list, please contact Ombudsperson Katie Zilgme, <a href="mailto:katie.zilgme@mass.gov">katie.zilgme@mass.gov</a>, or Deputy Ombudsperson Robert Fitzpatrick, <a href="mailto:Robert.J.Fitzpatrick@mass.gov">Robert.J.Fitzpatrick@mass.gov</a>.



# **EEA Updates**





- There are five workstreams that stem from the bill that are being administered by staff at three different agencies: EEA, DPU, and DOER.
- All three agencies are in close communication with each other, and other state agencies that have significant energy permitting
  roles have also been consulted as proposals are being developed.
- Regulations are required to be promulgated by March 1, 2026.
- In Spring 2025, the agencies held stakeholder sessions to provide information to the public on implementation, receive comments, and take questions on numerous straw proposals. More information is available on the <u>2024 Climate Act Stakeholder Sessions</u> webpage.





### Siting and Permitting Public Engagement Calendar

# **OCT/NOV 2025**

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
28	29	30	1	2	3	4
		7			10	11
5	6	/	8	DOER Info Session (Amherst)	10	11
	DOER Info Session (Bourne)	DOER Info Session (Danvers)		EEA Webinar on Site Suitability and CBA Guidance		
12	13	14	15	16	17	18
			DOER Public Hearing (Virtual)		DOER Written Comments Deadline	
19	20	21	22	23	24	25
					EEA Written Comments Deadline	
26	27	28	29	30	31	1
	EFSB/DPU Public Hearing (New Bedford)	1	EFSB/DPU Public Hearing (Pittsfield)			
2	3	4	5	6	7	8
	EFSB/DPU Public Hearing (Boston)		EFSB/DPU Public Hearing (Lynn)		EFSB and DPU Written Comments Deadline	



#### **Energy Affordability Bill – Solar Related Provisions**

On May 13<sup>th</sup>, Governor Healey filed the Energy Affordability, Independence, and Innovation Act (currently H.4144), which contained a number of proposed legislative changes that may impact solar in the Commonwealth:

- Net Metering Reforms (Sections 33-39)
- Amend SMART Program Requirements (Sections 47 and 48)
- Flexible Interconnection Program (Section 41)
- Comprehensive Grid Planning Reforms (Sections 29, 30, 56
- Inclusive Utility Investment Programs (Section 52)
- Government and Critical Facility Microgrids (Sections 41 and 55)



# **Topics for Discussion**

#### **Statewide Automated Electronic Permitting**



**Issue**: Inconsistent municipal permitting practices are a major barrier and cost driver for rooftop solar and energy storage. With 351 different jurisdictions, each with their own rules and procedures, the permitting landscape in Massachusetts presents challenges to solar and storage companies.

**Potential Solution**: Require the establishment of a statewide electronic permitting platform and standard permit form for rooftop solar (and potentially customer-sited storage). Potentially also require municipality to adhere to certain deadlines and impose permit fees not to exceed a particular amount.

**Ratepayer Impact:** None to negligible (potential startup costs of developing initial permitting framework/platform). May reduce the need for incentives.

Taxpayer Impact: None

**Legislation Required**: Yes

**Pending Legislation**: <u>H.3520</u> / <u>S.2269</u> – Sections 1 and 2

**Policies in Other States**: Rhode Island and Vermont have existing statewide electronic permitting. New York has a standard permit application form that municipalities can choose to adopt. California has required all city and county governments to adopt expedited, streamlined permitting processes for residential rooftop projects. In July 2025, New Jersey passed a law (A-5264) that requires the establishment of a statewide automated solar permitting platform.

#### **Cost Sharing for Small DG Upgrades**



**Issue**: Typically, small distributed generation facilities (e.g., less than 25 kW) do not have to pay for grid upgrades to interconnect; however, increasingly such facilities are triggering the need for new pole mounted transformers and occasionally face other unexpected utility upgrades or requirements.

**Potential Solution**: Allow customers to share transformer upgrade costs by establishing a small interconnection fee for small distribution generation facilities (e.g., less than 25 kW) that is collected by the EDCs with an application and used to cover transformer or other approved expenses when they are incurred.

Ratepayer Impact: None

Taxpayer Impact: None

Legislation Required: No

Pending Legislation: No

**Policies in Other States**: Connecticut has adopted a cost sharing policy for such upgrades via an order issued by PURA.

#### **State Residential Income Tax Credit**



**Issue**: Nearly all customer-owned residential solar projects that are eligible receive the maximum allowable state tax credit of \$1,000, which can be carried forward up to 3 years. While not insignificant, this likely only offsets 3% or less of a typical residential project's total cost. With the loss of the federal 30% residential tax credit beginning on January 1, 2026, out of pocket costs for residential customers considering solar are expected to significantly increase.

**Potential Solution**: Increasing the \$1,000 cap on the residential tax credit could create greater upfront incentives for residents to install solar. Direct pay provisions could also be explored, particularly for low- income residents with lower taxable incomes who may not be able to take advantage of a larger credit in a single tax year.

Ratepayer Impact: Would reduce reliance on ratepayer supported incentives.

**Taxpayer Impact:** Estimated at \$5-6 million per year for every \$1,000 the tax credit cap is increased.

**Legislation Required**: Yes. Requires amendment to G.L. c. 62 § 6.

Pending Legislation: <u>H.3520</u> / <u>S.2269</u> – Section 3

**Policies in Other States:** 

State	Credit	Cap	Carry Forward Rules
Arizona	10%	\$1,000	5 years
Montana	35%	None	7 years
New Mexico	10%	\$6,000	Provided as refund if exceeds tax obligation
New York	25%	\$5,000	5 years
South Carolina	25%	\$3,500	10 years
Vermont	7.2%	None	Not specified

#### **Solar Loan or Other Customer Financing Tools**



**Issue**: Residential solar installers have indicated that having a statewide solar loan program, similar to the HEAT Loan or the former Mass Solar Loan Program, would be a very helpful tool in promoting direct ownership of residential solar.

**Potential Solution**: Establish a Solar Loan Program via legislation or administrative action. Could take a variety of forms.

Ratepayer Impact: Depends on structure and funding source of program.

**Taxpayer Impact**: Depends on structure and funding source of program.

**Legislation Required**: Potentially

**Pending Legislation**: <u>H.4144</u> – Section 52

**Policies in Other States**: Many other states offer some type of financing options, which may include support for solar. Massachusetts has existing models on which it could draw from, including, the Mass Save HEAT Loan, the Mass Solar Loan Program, and MassCEC's plans to launch a new solar loan program via Solar for All.

### **Public Entity Net Metering Cap Exemption Donut Hole**



**Issue**: Private net metering facilities that serve on-site load and/or that are smaller than 25 kW are exempt from net metering caps, but public net metering facilities are not.

**Potential Solution**: Removing this restriction could encourage more customer-sited solar on publicly owned buildings and parking lots.

**Ratepayer Impact**: Negligible. Issue currently only impacts behind-the-meter facilities serving public buildings (e.g., government owned) in National Grid and Unitil territories. Unlikely to lead to a significant amount of net metering credits earned by such facilities as most energy generated would be consumed on-site.

**Taxpayer Impact**: None. Will create more state and local government budget flexibility by helping to reduce electricity costs in publicly owned buildings.

**Legislation Required**: Yes. Requires amendment to G.L. c. 164 § 139(i).

**Pending Legislation**: <u>H.3520</u> / <u>S.2269</u> – Sections 8 and 9

Policies in Other States: N/A

#### **Net Crediting for Community Solar**



**Issue**: Community solar credit recipients today receive their bill credits via their electric utility bill but pay for those credits via a separate bill issued by their community solar provider. This creates significant consumer protection issues and often leads to bad customer experiences (e.g., timing of utility bills and community solar provider bills not aligning, lump sums of credits and/or bills issued well after solar production occurred, etc.) that make it difficult to enroll and retain customers.

**Potential Solution**: Require utilities to implement net crediting (i.e., consolidated billing), which allows for community solar providers to deliver credits and receive payment for them via a single consolidated bill, which is the customer's utility bill.

**Ratepayer Impact**: Costs associated with updating utility billing systems must be recovered, but some or all these costs could be borne or repaid by community solar projects that end up utilizing net crediting, potentially eliminating the need for ratepayer support.

Taxpayer Impact: None

Legislation Required: No

**Pending Legislation**: DPU required to investigate establishment of net crediting pursuant to Section 106 of the 2024 Climate Act.

**Policies in Other States**: The New York Public Service Commission, in coordination with NYSERDA, undertook a multi-year effort to require all investor-owned electric utilities to establish net crediting for community solar. Consolidated billing also already exists for competitive retail electricity supply offerings in over a dozen states, including Massachusetts.

### Uniform Property Tax Rate for Standalone Solar



**Issue**: Solar projects larger than 25 kW that generate more than 125% of their annual on-site energy consumption (mostly large standalone ground-mounted facilities) are exempt from local property taxes only if they enter into a PILOT agreement. These are often challenging and time consuming to negotiate and there can be major differences in tax rates from one town to the next.

**Potential Solution**: G.L. c. 59 § 5 clause 45A provides a fixed PILOT rate for hydroelectric facilities that is equal to 5% of the facility's gross income in the preceding year. A similar fixed rate could be established for solar facilities that is based off of an average of existing PILOT rates for solar facilities. Legislation establishing similar statewide rates has recently been enacted in other states.

**Ratepayer Impact**: None. May reduce incentives required to support new solar development.

**Taxpayer Impact**: Depending on where statewide PILOT rates are set, it could result in more or less revenue for a municipality relative to the status quo.

Legislation Required: Yes. Requires an amendment to G.L. c. 59 § 5 clause 45.

**Pending Legislation**: None. Legislation establishing uniform property tax rates for solar was nearly enacted in 2012 but did not survive conference committee negotiations for St. 2012 c. 209.

**Policies in Other States**: Vermont established a uniform commercial solar property tax rate of \$4 per kW in 2013. Rhode Island established a uniform commercial solar property tax rate of \$5 per kW in 2017. Maine provides a complete exemption from property taxes if a commercial facility provides bill credits to off-takers for energy produced.

### 10 MW Public Entity Host Customer Cap



**Issue**: State net metering rules limit the amount of net metering capacity that a single public entity can "host" to 10 MW. This was originally designed to ensure that no one entity claimed what was at the time a relatively scarce amount of net metering capacity. However, now prevents select public entities (e.g., municipalities, state universities, etc.) that have hit their caps from installing more solar, despite having the roof space or parking lots to host it.

**Potential Solution**: Increase or eliminate the statutory cap.

**Ratepayer Impact**: Negligible. Increasing or eliminating this cap would allow municipalities, state entities, and federal agencies (e.g., military bases) that have reached their 10 MW cap to build more solar facilities to meet their energy needs but is unlikely to result in a significant increase in net metering costs.

**Taxpayer Impact**: None. Will create more state and local budget flexibility by reducing electricity costs in publicly owned buildings.

**Legislation Required**: Yes. Requires an amendment to G.L. c. 164 § 139(f).

Pending Legislation: No

Policies in Other States: N/A





**Issue**: Current state law provides a sales tax exemption for solar used as a primary or auxiliary energy source in a principal residence. Sales tax does apply to all other types of solar facilities though, which increases installation costs.

**Potential Solution**: Extend the sales tax exemption to apply to some or all commercial solar facilities.

Ratepayer Impact: None.

**Taxpayer Impact**: Unclear. Requires further analysis.

**Legislation Required**: Yes. Requires amendment to G.L. 64H § 6(dd).

Pending Legislation: H.3520 / S.2269 – Section 7

**Policies in Other States**: All other New England states exempt some or all commercial solar projects from sales tax, as well as residential projects. At least 23 other states also either exempt all solar projects from sales tax or do not have a sales tax on any goods or services (Alaska, Arizona, Colorado, Delaware, Florida, Indiana, Iowa, Louisiana, Maryland, Michigan, Minnesota, Missouri, Montana, New Jersey, New Mexico, Ohio, Oregon, Tennessee, Utah, Virginia, Washington, Wisconsin, and Wyoming).

#### Workforce



**Issue**: In Massachusetts, "electrical work" for a solar installation encompasses all aspects of the solar PV system, including the installation of wires, conduits, apparatus, devices, fixtures, and appliances for carrying electricity, and must be performed by a Massachusetts-licensed electrician. This is because Massachusetts law and board rulings (e.g., Board of State Examiners of Electricians) classify the entire installation process, from PV components to grid interconnection, as electrical work. These definitions/classifications have implications for licensing, certification, worker availability, and project costs.

**Potential Solution**: Examine and reconsider definition of what constitutes "electrical work" for solar installations and implications for/changes to related requirements.

Ratepayer Impact: May lead to lower installation costs, which could reduce need for incentives.

Taxpayer Impact: None

**Legislation Required**: Likely

**Pending Legislation**: S.290 (does not address definition of electrical work, but does propose changes to licensing and ratio requirements)

**Policies in Other States**: Many states have more detailed definitions of what constitutes electrical work. Many also have solar installer licensing requirements (AZ, CA, FL, GA, IL, NV, NJ, NY, NC, TX, VA), which typically require an electrician's license as well.





**Issue**: There are numerous consumer protection issues related to the marketing of solar products to residential customers and contractual relationships between installers and customers.

Potential Solution: Establish more explicit consumer protection standards and oversight.

Ratepayer Impact: Depends on details of proposal.

**Taxpayer Impact**: Depends on details of proposal.

**Legislation Required**: Potentially

Pending Legislation: <u>H.450</u>; <u>S.2264</u>

**Policies in Other States**: Numerous states have consumer protection standards for solar, typically focusing on community solar and residential solar. Massachusetts has historically enforced consumer protection standards via their inclusion in state incentive program requirements.





**Issue:** Solar deployment rates are approximately 10 times higher in investor-owned utility service territories than municipal light plant

service territories.

Program	IOU	MLP
Early MassCEC Rebate Programs	1,000	0
SRECI	9,892	527
SRECII	66,200	1,532
SMART	49,257	0
MLP Solar	0	531
Net Metering and/or Class I RECs	36,000	0
Est. # of Homes w/ Solar	162,349	2,590
Number of Households	2,245,139	347,703
Est. % of Households w/ Solar	7.2%	0.7%

**Potential Solution:** Establishment of solar deployment targets and/or programs for MLPs.

Ratepayer Impact: Depends on structure and funding source of program.

**Taxpayer Impact**: Depends on structure and funding source of program.

**Legislation Required**: Potentially

Pending Legislation: None

**Policies in Other States**: Many states (including Massachusetts) require municipal utilities and electric cooperatives to meet statewide renewable and/or solar targets.

#### **Net Metering Costs**



**Issue:** Net metering credit values are tied to volumetric retail rate components. As those rates increase, the Net Metering Recovery Surcharge increases, regardless of whether new net metering facilities are enrolled in the tariff. If limits are not imposed, costs could grow to levels that the public will not accept.

Potential Solution: Establish limits on net metering credit values for new facilities as of a date certain.

**Ratepayer Impact**: Could avoid a very significant amount of ratepayer costs but is very dependent on details of proposed changes.

Taxpayer Impact: None.

Legislation Required: Yes.

**Pending Legislation**: H.4144 – Sections 38 and 39

**Policies in Other States**: Most other leading solar states have revised compensation for net metering facilities to provide credits for excess generation at rates below retail electricity prices.



## **Breakout Discussions**





#### **Questions to Guide Discussion**

- Among the issues discussed today (and those that were not), where should the administration direct its attention and prioritize resources?
  - What about the legislature? The utilities?
- How should the administration and legislature continue to engage on these topics after today?



# Thank you!