



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

June 30, 2016

Dear Commissioner Judson,

Clean Water Action is a national environmental organization, with close to 50,000 members across Massachusetts. We are Steering Committee members of the Green Justice Coalition, a partnership between labor unions, environmental advocacy groups and dozens of grassroots community groups all over the state, who together have enjoyed broad success in improving access to the state's energy efficiency program, and who advocate for the many residents who similarly desire to participate in the solar economy. We are pleased to submit these comments today in support of a low-income solar program that provides access for our members to the benefits of local solar energy, and for the many other Massachusetts residents who also have been unable to access its benefits.

Community-scale locally-owned solar PV has been extremely successful and holds great promise; we are eager to see state programs that improve access to it for low-income residents, and especially renters, who in many Massachusetts cities make up two-thirds or more of the population. The Department could define low-income in various ways, but there are existing thresholds, such as for reduced utility customer tariffs, that provide a simple guide. Low-income solar projects should include those installed by individual low-income customers qualifying under the established threshold, those that benefit publicly-owned low-income housing, and those undertaken by entities representing primarily low-income communities and/or communities of color.

Improving access for low-income communities to solar programs will require making project financing more realistic. Since even mission-oriented investors require a minimum return, the state can explore ways to allow for community-owned projects in low-income communities to capture full retail net metering rates. One avenue we would suggest is for the Department to spell out the parameters for low-income community shared solar (CSS) projects to be developed in partnership with a municipal project anchor, since municipal projects are

exempted from the 40% drop in net metering payments in the recent solar legislation. This should be complemented by a strong incentive for low-income projects, in line with the existing SREC incentive, making low-income projects more attractive to third-party investors.

Other ways the administration can help expand CSS include by taking strong positions in relevant forums to raise or eliminate the net metering caps, and by signaling to the DPU a strong preference against standalone generation fees on utility bills; both of these artificial limits can have extremely disruptive and deleterious effects on the solar economy, and thwart the administration's stated goal of increased access for low-income communities and communities of color to clean energy. In addition, the state could assist the development of more CSS by working with ISO-New England, the utilities, the DPU and any other relevant stakeholders to explore redrawing the region's load zones and allow for customers in congested areas with scarce and expensive land to use land further afield where it is cheaper and more plentiful, to site community solar projects via virtual net metering.

Public education is an important tool for attracting non-participating segments of the population. A website hosted by a trusted and disinterested entity, perhaps the MA Clean Energy Center, which conveys details of solar policy in non-technical language would be especially useful, including a step-by-step guide to building CSS projects, with the incentives for different types of projects. This site should be translated into the six most prevalent non-English languages spoken in MA communities of color, an emerging environmental justice standard.

Lastly, if the administration convenes a working group to determine a final incentive rule, we strongly suggest that representatives of environmental justice communities and organized labor be included in its membership. Clean Water also is happy to make ourselves available to inform any further discussion convened by the administration on this topic. Thank you for your attention to these suggestions, and for accepting public input on this far-reaching matter.

Sincerely,

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