



Massachusetts Department of Energy Resources  
100 Cambridge Street #1020  
Boston, MA 02114  
Email: DOER.SMART@mass.gov  
Re: PY26 Annual Report Public Comment  
ATTN: Smanatha, Meserve, Director – Renewable and Alternative Energy Division

Dear Director Meserve,

Hyperion Systems, LLC (“Hyperion”) appreciates the chance to offer written comments to the Department of Energy Resources (“DOER”) regarding Program Year 2026 Annual Report Public Comment.

Hyperion is a project development and research organization based in Western Massachusetts. Hyperion has been in business in the Commonwealth for the past 15 years investigating the dual-use solar concept. Hyperion has strong working relationships with many of the stakeholders within the agrivoltaic industry including agricultural producers, research institutions, and other agrivoltaic developers. Our comments are guided by our personal experience and those of the overall industry working here in Massachusetts.

First, Hyperion commends DOERs rollout of the SMART Program on such short terms. It has spurred solar project development interest at a time when it’s absolutely needed in the Commonwealth. 900MW in PY25 is a serious commitment towards driving project development and ultimately energy generating assets at a time when it’s absolutely needed to meet our RPS goals and basic energy needs. Hyperion is excited to have submitted applications for PY25 capacity set asides and we look forward to submitted applications for PY26.

Hyperion shared two primary comments for PY26.

1. Reducing the program capacity to half that of PY25 will limit the number of projects that are able to achieve PSQ and ultimately be built and commissioned in a timely manner – that is while the ITC is still available. Developers have not had enough time since program release to get permits and interconnection agreements to apply for PY25. Hyperion believes there will be considerable program capacity left over in PY25 but that there will be an overflow of projects applying for PY26. Hyperion recommends solving this is doubling the PY26 capacity to match PY25 at 900MW ac.

2. The PY26 Draft Report reduces BCRs across the board compared to PY25. In the >250 and <500kW STGU category, which is most of Hyperion Systems' projects, the BCR drops by ~10%. Smaller commercial projects are disproportionally impacted by these reductions compared to 2-5MW projects since these smaller projects cannot achieve economies of scale. In SMART 1.0 and SMART 2.0, capacity block reductions were 4%. Hyperion encourages maintaining PY25 BCR rates, but if reductions are needed, those reductions should be consistent with past SMART iterations and not more than a 4% reduction for PY26 compared to PY25.

Thank you for your consideration of these comments and for the Department's commitment towards a renewable energy future for the Commonwealth.

Respectfully submitted by:

A handwritten signature in black ink that reads "Jake Marley". The signature is written in a cursive, flowing style.

Jake Marley  
Managing Director  
Hyperion Systems, LLC