

Samantha Meserve
Director, Renewable and Alternative Energy Division
Massachusetts Department of Energy Resources
100 Cambridge Street, 9th Floor
Boston, MA 02114

October 31, 2025

Re: Comments on the SMART 3.0 2026 Annual Report

Director Meserve,

ECA Solar submits this comment on the proposed SMART 3.0 2026 Annual Report. ECA Solar appreciates the opportunity to provide the Department of Energy Resources (“DOER”) feedback on the proposed base compensation rates and program size for Program Year 2026. The Commonwealth’s commitment to supporting solar and clean, distributed, resources is critical during this time of significant challenges for the industry. SMART 3.0 is the primary driver of the development of those resources, and the details are critical to the success of the program. ECA Solar sincerely appreciates the opportunity to provide feedback to DOER and the iterative process that has been developed to create a strong program. The new process that DOER has developed to implement SMART 3.0 can support energy growth, with a few targeted improvements. We sincerely appreciate all of the DOER’s hard work, and we look forward to a continuing dialogue in this process.

Independently owned and operated for over 11 years, ECA Solar develops community-scale solar projects that provide significant benefits to the local economy, community, and environment. With our full-service platform, we de-risk every project through comprehensive due diligence and streamlined operations. As a trusted and reliable partner, we partner with landowners to create a solution that protects their land and secures their financial future. Investors trust us to secure land, permits, utility approvals, while keeping a pulse on the changing regulatory environment. With our decades of experience, a strong reputation, and proven industry leadership, we enable clean energy for the communities of tomorrow.

DOER Should Adopt SEA’s Proposed Base Compensation Rates or Keep the Program Year 2025 rates

ECA Solar strongly supports the comments submitted by the Clean Energy Groups which detail the results of further analysis completed by Sustainable Energy Advantage (SEA). The Clean Energy Groups comments detail the results of SEA’s analysis, and how it differs from the results of the analysis completed by BW Research Partners for DOER. Without repeating those details, it is common sense that the Base Compensation Rates for 2026 should not change from 2025. Macro-economic conditions have increased prices everywhere, and the short timeline of the 2025 Program Year means that DOER does not have a major data point to determine how the

market has responded to those incentive values. Adopting SEA's proposed base compensation rates, or maintaining the Program Year 2025 rates is a logical step in the rollout of a new program.

DOER Should Increase the Energy Storage Adder Multiplier to Tranche 1, for Program Year 2025 and 2026

One major cost driver has been in Energy Storage technology as mineral prices have risen due to tariffs. SEA's analysis demonstrates that there is a significant gap in the revenue requirement for energy storage projects from the current proposed Tranche 14 levels. We support the Clean Energy Group's position to increase the Energy Storage Adder Multiplier from Tranche 14 to Tranche 1 for both the 2025 and 2026 Program Years.

DOER Should Keep the Community Solar Adder Value so Long as Base Compensation Rates Increase

As demonstrated by SEA's analysis, the community solar adder of \$.07/kWh should be sufficient for Program Year 2026, but only if base compensation rates increase. The change to subscriber savings requirements implemented in the final SMART 3.0 regulations will have an impact on project financing, and while the progress of Alternative Community Solar programs and the net crediting docket at the Department of Public Utilities will help bring costs down for community solar projects, we encourage DOER to closely monitor this adder value. The savings requirements are a major change to the value stack for these projects, without clear movement on operational cost savings. As the market adjusts to the savings requirements, we urge DOER to consider any new market information that could information program year 2027 differently.

DOER Should Finalize the Program Year 2026 Capacity after the Close of Program Year 2025

Several factors are currently impacting whether projects can submit applications for Program Year 2025, including uncertainty over the final rules for forest carbon eligibility and energy storage adder values. DOER has repeatedly stated that there will be no carryover capacity between program years, but ECA Solar strongly supports DOER finalizing the total capacity for 2026 after 2025 is finished subscribing. The Commonwealth has indicated a strong desire to see projects move forward. If, as the Clean Energy Group letter states, Program Year 2025 is undersubscribed, it would be beneficial to the Commonwealth for DOER to increase the Program 2026 capacity.

Thank you again for your consideration of these comments. If you have any questions, please feel free to contact me at ko@ecasolar.com.

Sincerely,

Kaitlin Kelly O'Neill
Director of Policy

www.ecasolar.com
info@ecasolar.com
508.460.2068

