

Commonwealth of Massachusetts

**Executive Office of Energy and Environmental Affairs
DEPARTMENT OF ENERGY RESOURCES**

**SOLAR MASSACHUSETTS RENEWABLE TARGET PROGRAM 3.0
(225 CMR 28.00)**

GUIDELINE

Statement of Qualification Reservation Period Guideline

1) Background and Purpose

This Guideline provides Applicants and Owners with information relating to the processes and procedures that they must follow to both obtain and retain a Statement of Qualification pursuant to 225 CMR 28.06 and 225 CMR 28.07. All capitalized terms are defined in 225 CMR 28.02.

2) Initial Reservation Periods and Extended Reservation Periods

a) Reservation Periods and Expiration Dates

Pursuant to 225 CMR 28.06(2)(a)1., all Solar Tariff Generation Units (STGUs) will receive an initial Reservation Period of 24 months from the issuance date of the preliminary Statement of Qualification (PSQ). Unless the Applicant submits an incentive claim for the STGU within its initial Reservation Period or the STGU receives an extension under Section 2 of this Guideline, the STGU's PSQ will expire and will be revoked by the Department.

Following construction and authorization to interconnect, an Applicant must submit an incentive claim to the Solar Program Administrator. If the STGU meets all eligibility requirements pursuant to 225 CMR 28.00, the Department shall issue a final Statement of Qualification (FSQ) and the STGU may begin its SMART Tariff term upon the Incentive Payment Effective Date listed in the FSQ.

i. Initial Reservation Period for Capital Investment Projects

At the time of submission of a Statement of Qualification Application, if an STGU provides documentation from the Distribution Company or the Department of Public Utilities that the STGU is participating in an approved Capital Investment Project, the STGU will receive an initial Reservation Period of 48 months from the issuance date of the PSQ.

b) Extended Reservation Periods

The Department may grant extensions to an STGU's Reservation Period under the following circumstances:

i. Extended Reservation Period for a Fee

An STGU may seek an extended Reservation Period of twelve months by paying a fee to the Solar Program Administrator. The fee shall be \$25 per kW AC, shall be held by the Solar Program Administrator in escrow, and shall be refundable upon submission of final claim if the STGU achieves mechanical completion within the extended Reservation Period. If the STGU does not achieve mechanical completion within the extended Reservation Period, the STGU's PSQ shall expire, and the fee will be used to offset the administrative costs incurred by the Solar Program Administrator.

If an STGU has received a Storage Addendum and seeks to extend its Energy Storage Adder Reservation Period under this section, the Applicant shall pay a separate fee of \$25 per kW AC for the Energy Storage System (ESS) and receive a twelve-month extended Reservation Period. The same terms for the fee apply as described above for the STGU.

To be considered for this extension, an STGU must submit its request via the SMART Program application portal prior to the STGU's Reservation Period expiration date.

ii. Extended Reservation Period for Legal Challenges

An STGU may seek an extended Reservation Period for an amount of time to be determined by the Department if the STGU submits evidence that a governmental permit or approval of the STGU was subject to a legal challenge initiated by a party other than the Applicant, Customer of Record, or Owner during its Reservation Period. To be considered for this extension, the STGU must submit its request directly to DOER at DOER.SMART@mass.gov prior to the STGU's Reservation Period expiration date and provide supporting documentation to demonstrate the nature and status of the legal challenge and the duration of delay to the STGU. The request should also specify the duration of extension requested.

iii. Extended Reservation Period Pending Authorization to Interconnect

If an STGU can demonstrate to the Department's satisfaction that the STGU has achieved Mechanical Completion and that interconnection depends only on receipt of notice of authorization to interconnect from the Distribution Company, its Reservation Period shall be extended indefinitely until such notice is received or denied. To be considered for this extension, the Applicant should provide a Certificate of Completion signed and dated by the local wiring inspector prior to the STGU's Reservation Period expiration date. If the Applicant cannot obtain the Certificate of Completion, the Applicant may provide a copy of the completed and

signed electrical inspection or an attestation letter of mechanical completion, signed and dated by a third-party professional engineer prior to the STGU's Reservation Period expiration date.

If an STGU has received a Storage Addendum and seeks to extend its Energy Storage Adder Reservation Period under this section, the Applicant must demonstrate that the ESS is Mechanically Complete and pending authorization to interconnect from the Distribution Company, through the same procedures as described above for the STGU.

If the Energy Storage Adder is included in the STGU's PSQ and the Applicant is seeking an extension under this section for both the STGU and the ESS, the Applicant must demonstrate that both are mechanically complete. If only the STGU is mechanically complete, the Applicant may request a Storage Addendum to de-couple the Energy Storage Adder from the PSQ and receive an additional twelve-month Reservation Period for the ESS.

To be considered for this extension, an STGU must submit its request via the SMART Program application portal prior to the STGU's Reservation Period expiration date.

iv. Extended Reservation Period for Interconnection Studies

If an STGU can demonstrate to the Department's satisfaction that it has received notification from the Distribution Company that the STGU is included in a group interconnection study, and as a result, is subject to extended delays, its initial Reservation Period may be extended until the completion of the interconnection study. Upon completion of the interconnection study, the STGU's initial Reservation Period will resume, and the PSQ expiration date will be updated to reflect the duration time that was remaining in the Reservation Period when the STGU received an extension under this section. It is the Applicant's responsibility to notify the Department and Solar Program Administrator when the interconnection study is complete. The Department will also receive ongoing updates from each of the Distribution Companies on the status of interconnection studies and the affiliated projects. To be considered for this extension, the STGU must submit its request via the SMART Program application portal prior to the STGU's Reservation Period expiration date.

v. Extended Reservation Period for Good Cause

If an STGU has already received an extension under Section 2)b)i., the Extended Reservation Period for a Fee, and can demonstrate to the Department's satisfaction that good cause warrants a further extension not provided for under another section of the Guideline, its Reservation Period may be extended further, for an amount of time to be determined by the Department, informed by third-party documentation of the delays.

To receive an Extended Reservation Period for Good Cause, the Applicant must demonstrate that the STGU has been impacted by extenuating or unforeseeable circumstances concerning the construction of the STGU that are outside of the Applicant's control and could not have been reasonably avoided. The Applicant must provide supporting documentation of the delays from third parties, and the documentation must demonstrate that the duration of delay aligns with the duration of extension requested. The Department reserves the right to automatically deny extension requests that are submitted without supporting documentation.

Below are examples of circumstances that the Department may consider eligible for a good cause extension:

- equipment procurement or shipping delays;
- municipal permitting delays; and
- interconnecting utility delays related to STGU design, system upgrades, or other circumstances

Below are examples of documentation that the Department may accept as evidence of delay:

- email communications with third parties;
- letters from third parties;
- third party meeting minutes;
- governmental permits or approvals;
- equipment purchase orders and delivery timelines; and
- construction schedules.

If an STGU has received a Storage Addendum and seeks to extend its Energy Storage Adder Reservation Period under this section, the Applicant must submit a separate request for the Storage Addendum and provide supporting documentation specific to the delays that have impacted the ESS.

To be considered for this extension, the STGU must submit its request via the Good Cause Extension Request Form on the Department's website and via the SMART Program application portal prior to the STGU's Reservation Period expiration date. If an Applicant fails to submit an extension request in the application portal prior to the STGU's Reservation Period expiration date, the STGU will forfeit its reservation and must submit a new Statement of Qualification Application.

3) Application Processing Procedures

a) Construction Date Requirement for Program Transition

For the first two Program Years, and upon request thereafter, Applicants must demonstrate that they did not start on-site physical work of a significant nature on the solar photovoltaic generation unit prior to June 20, 2025. STGUs qualifying for the Low Income Property adder must demonstrate that they did not start on-site physical

work of a significant nature on the solar photovoltaic generation unit prior to July 1, 2024.

On-site physical work does not include activities related to the planning of construction, such as purchasing equipment, obtaining permits, conducting studies or modeling, and site clearing. On-site physical work does include the installation of racking, support structures, or modules at the project site.

Below are examples of documentation that the Department may accept as evidence to satisfy this requirement:

- Time-stamped photos of the project site
- Aerial imagery of the project site
- Signed attestation from EPC contractor
- Time-stamped communications regarding installation work
- Documentation of participation in an approved Capital Investment Project
- Agenda or meeting minutes from municipal board meetings

b) Application Review for STGUs Subject to Capacity Block

i. Initial 10 Business Days

All Statement of Qualification Applications that are submitted within the first 10 Business Days of the Program Year will be considered to have been submitted at the same time. After the 10 Business Day period closes, the Program Administrator will sequence all applications submitted during that period by Interconnection Service Agreement (ISA) Application Date and allocate the capacity according to that sequence. For documentation of ISA Application Date, an Applicant should provide the dated ISA Application, along with confirmation from the Distribution Company that the application has been deemed complete. Per 225 CMR 28.06(1)(c)1., applicants are required to provide a fully executed ISA in addition to the ISA Application at the time of preliminary Statement of Qualification Application, unless explicitly exempt. The only project types exempt from providing a fully executed ISA at the preliminary application stage are Brownfield, Landfill, and Public Entity STGUs.

If there is remaining capacity available after the initial 10 Business Days, it can be reserved on a first-come first-served basis. If all the capacity has been reserved during the 10 Business Days, subsequent applications will be placed on the waitlist.

ii. Waitlist

When all the capacity for the Program Year has been reserved, a waitlist will be published on the program website and updated weekly. A project may be selected off the waitlist if another project with reserved capacity is withdrawn

or denied. The first project on the waitlist will only be selected if there is sufficient capacity to accommodate it and it fits within the available project categories. For example, if a 1 MW project withdraws its application, but the first project on the waitlist is 3 MW, it will not be offered a reservation until there is sufficient capacity available. If there is only capacity remaining within the set aside categories, a project must qualify under an available set aside to be selected off the waitlist.

When a project is selected off the waitlist, the Applicant must respond and accept the offered reservation within 10 Business Days. If the Applicant does not respond in the affirmative by 5:00 pm on the 10th Business Day after the reservation was offered, the reservation will be offered to the next eligible project on the waitlist. Projects on the waitlist will be queued and processed first at the beginning of the next Program Year, ahead of newly submitted applications for that Program Year, which shall be queued as provided in Section 3)b)i) after the waiting list from the prior Program Year.

4) Adder Eligibility and Qualification

a) Locational, Solar Tracking, and Pollinator Adders

An Applicant may apply for a locational, solar tracking, or pollinator adder at the time of Statement of Qualification Application or during the STGU's Reservation Period. The following documentation will be required to qualify for each of these adders:

Adder	Documentation Required at Application	Documentation Required at Final Statement of Qualification
Brownfield	-Pre-determination letter -Complete ISA Application	-Executed ISA -Authorization to interconnect
Building Mounted, Large Building Mounted, or Raised Racking	Site plan	Authorization to interconnect
Canopy	Site plan	Authorization to interconnect
Dual-use Agricultural	Pre-determination letter	-Updated agricultural plan -Authorization to interconnect
Floating	Pre-determination letter	Authorization to interconnect
Landfill	-Post-closure use permit from Department of Environmental Protection	-Executed ISA -Authorization to interconnect

	-Complete ISA Application	
Solar Tracking	Site plan	Authorization to interconnect
Pollinator	Certification letter from UMass	Authorization to interconnect

An STGU may also apply and qualify for the Pollinator adder after its Commercial Operation Date and during its tariff term by providing a certification letter from UMass. The STGU will receive the adder value that is in effect for the Program Year in which it qualifies for the adder. The STGU will only receive the adder for the remainder of its tariff term, provided it meets ongoing annual compliance requirements.

b) Off-taker Adders

An Applicant may apply for an Off-taker Based Adder at the time of Statement of Qualification Application, during the STGU's Reservation Period, or after its Commercial Operation Date, provided it is still within its tariff term. The STGU will receive the adder value that is in effect for the Program Year in which it qualifies for the adder. An STGU may only add, switch or remove an Off-taker Based Adder once during its tariff rate term, and it will only receive the new adder for the remainder of the tariff term.

The following documentation will be required to qualify for each of the Off-taker Based Adders:

Adder	Documentation Required at Application	Documentation Required at Final Statement of Qualification
Community Shared Solar	N/A	<ul style="list-style-type: none"> -Schedule Z/AOBC Form/Off-taker list -Customer Disclosure Forms -Customer Contracts -Evidence of low income eligibility -Evidence of minimum discounts -Authorization to interconnect
Alternative Community Shared Solar – <i>Municipal Aggregation</i>	Pre-determination letter and approval from MassDPU regarding compliance with	<ul style="list-style-type: none"> -Off-taker list -Authorization to interconnect

	municipal aggregation requirements	
Alternative Community Shared Solar – <i>Distribution Company Program</i>	N/A Notification of participation from Distribution Company	-Notification of selection from Distribution Company -Authorization to interconnect
Low Income Property	-Executed agreement with eligible property -Pre-determination letter (optional)	-Schedule Z/AOBC Form/Off-taker list -Off-taker contract -Authorization to interconnect
Public Entity	-Award letter/Letter of Intent -Complete ISA Application	-Schedule Z/AOBC Form/Off-taker list -Executed ISA -Executed right to construct -Authorization to interconnect

c) Energy Storage Adder

Pursuant to 225 CMR 28.07(4)(e), all STGUs greater than 1 MW must be co-located with an ESS, unless the STGU qualifies for a Locational Compensation Rate Adder or has received an exception for good cause from the Department.

All other STGUs choosing to pair with an ESS may apply for the Energy Storage System Compensation Rate Adder at the time of Statement of Qualification Application, during the STGU's Reservation Period, or after its Commercial Operation Date, provided it is still within its tariff term. The STGU will receive the adder multiplier value that is in effect for the Program Year in which it qualifies for the adder. An STGU may only add or remove the Energy Storage System Compensation Rate Adder once during its tariff term, and it will only receive the adder for the remainder of the term.

If an STGU is applying for the adder during its Reservation Period, the STGU will be issued a Storage Addendum, establishing a separate 12-month Reservation Period for the ESS. Unless the ESS reaches Mechanical Completion during the Addendum's Reservation Period or the ESS receives an extension under Section 2)b) of this Guideline, the STGU will lose its eligibility for the Energy Storage Compensation Rate Adder.

If an STGU received the Energy Storage System Compensation Rate Adder on its PSQ but the STGU reaches mechanical completion before the ESS, the Applicant may request to de-couple the STGU and the ESS at that time and receive a 12-month

Storage Addendum. The Storage Addendum will contain the same adder value as the STGU's original PSQ.

5) Application Review Following the Completion of a Group Study, Affected System Operator Study, or Capital Investment Project

If a distribution company completes a group study, Affected System Operator study, or Capital Investment Project (CIP), and the Distribution Company has issued multiple ISAs at approximately the same time, the Department may inform Applicants that it will pause application processing within that Distribution Company's open Capacity Block for no shorter than a five-day period. During that time, all applications will be considered to have been submitted at the same time, and applications will be sequenced by ISA Application Date. The Department will only conduct this procedure during a Program Year in which there are no projects on the waitlist. If there is an active waitlist, applications submitted after the completion of the study will be placed on the waitlist.