



COMMONWEALTH OF MASSACHUSETTS

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SMART Program 400 MW Review

September 5, 2019

SMART Application Statistics

- Since its launch on November 26, 2018, the SMART Program has received 11,300 applications for over 1,000 MW of capacity

	# of Applications	Capacity	Installed
Large: >25kW AC	794	939 MW	14 MW
Small: <=25 kW AC	10,517	78 MW	20 MW
TOTAL	11,311	1,017 MW	34 MW

- SMART Capacity Blocks for Large (>25kW <=5MW) Systems are full or nearly full in most territories

Electric Distribution Company	Eversource MA East	Eversource MA West	National Grid (Massachusetts Electric)	National Grid (Nantucket)	Unitil
Accepting Applications for Block:	3 of 8	Waiting List	Waiting List	1 of 2	Waiting List

- SMART Capacity Blocks for SMART (<=25kW) Systems are progressing at a steady pace

Electric Distribution Company	Eversource MA East	Eversource MA West	National Grid (Massachusetts Electric)	National Grid (Nantucket)	Unitil
Accepting Applications for Block:	2 of 8	4 of 8	3 of 8	1 of 2	2 of 4

Scope of 400 MW Review

- 400 MW Review is required to look at compensation rates, adders, and total program costs:
 - (5) Review of Compensation Rates. Upon issuing Statements of Qualification for 400 MW of Solar Tariff Generation Units, the Department will conduct a review of the Base Compensation Rates, Compensation Rate Adders, and overall cost impact to ratepayers to determine if any revisions to the SMART Program are necessary.
- DOER proposes to examine the following issues as well:
 - Addressing program oversubscription
 - Land use impacts
 - Geographic and project type diversity
 - Accessibility of program to low income communities
 - Other administrative fixes

Benefits of SMART Program Proposals

- The proposals of the 400 MW review are aimed at continuing to achieve the environmental and economic benefits of increasing solar installations in the Commonwealth
- DOER's proposals are particularly designed to achieve the following:
 - Help conservation impact of siting solar
 - Help to alleviate grid saturation and target interconnection sites
 - Encourage greater benefits from pairing solar with energy storage
 - Provide certainty for solar development in the next few years

Program Expansion

Program Oversubscription Analysis

- Capacity Block Reservations are progressing unevenly across different service territories
 - National Grid, Eversource West, and Unitil have Waiting Lists
- Capacity Blocks for Small systems ($\leq 25\text{kW}$) have been progressing at a steadier pace
- Small and mid-size commercial applications compete for capacity with large ground mounted applications
- Applications have been submitted for half of all available capacity 4 months into the SMART program
 - Data is skewed by large number of applications in initial week
- Outside of Week 1, application rates have steadied
 - Large: Approximately 47 MW/ month
 - Small: Approximately 8 MW/ month

Program Expansion Proposal

1. **Expand SMART Program by 800 MW, with future Capacity Block values declining by 2% per block for Behind-the-Meter systems, and by 4% for Standalone Systems**
2. **All Solar Tariff Generation Units > 500 kW must be paired with Energy Storage**
 - Allows for the following number of new Capacity Blocks:
 - 4 Capacity Blocks for Eversource (both East and West)
 - 4 Capacity Blocks for National Grid
 - 2 Capacity Blocks for Unitil
 - 1 Capacity block for Nantucket
 - Eversource East and West Large Capacity Blocks will remain separate and continue to accept applications through Block 8
 - Under the program extension, Eversource Capacity Blocks will retain separate rates for East and West, but expanded capacity will be available to both under one Capacity Block
 - Expansion will continue to address land use concerns, and alleviate market pressure in service territories with waiting lists
 - Eversource Capacity Blocks will retain separate rates for East and West, but expanded capacity will be available to both under one Capacity Block after Block 8

Program Expansion

Capacity Blocks by Service Territory

Distribution Company	Block 1	Block 2	Block 3	Block 4	Block 5	Block 6	Block 7	Block 8	Block 9	Block 10	Block 11	Block 12	Total
Unitil	3.947	3.947	3.947	3.947	3.947	3.947	N/A	N/A	N/A	N/A	N/A	N/A	23.682
National Grid (Massachusetts Electric)	90.022	90.022	90.022	90.022	90.022	90.022	90.022	90.022	90.022	90.022	90.022	90.022	1,080.266
National Grid (Nantucket Electric)	3.021	3.021	3.021	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.063
Eversource (East)	91.514	91.514	91.514	91.514	91.514	91.514	91.514	91.514	107.249	107.249	107.249	107.249	1,286.988
Eversource (West)	15.735	15.735	15.735	15.735	15.735	15.735	15.735	15.735					
Total Capacity	204.239	204.239	204.239	201.218	201.218	201.218	197.271	197.271	197.271	197.271	197.271	197.271	2,400.000

- **Anticipating market response and subsequent increase in application numbers, DOER expects expansion to allow program to last around 5 years**
- Large applications have applied at a pace of about 47 MW per month. Assuming applications continue at this pace, DOER estimates:
 - The current remaining capacity, combined with an 800 MW expansion, should last around 82 months, or around 7 years
- Small Applications have applied at a pace of about 8 MW per month
 - The current remaining capacity, combined with an 800 MW expansion, should last around 66 months, or around 5.5 years

Land Use Proposal

Current Status

The SMART program was designed to create a diversity of project types and to steer development away from large scale ground mounted projects in undeveloped spaces

	Category 3	Category 2	Category 1							
Project Type	Ground Mounted and not C&I Zoned	Ground Mounted, C&I Zoned, and NOT Previously Developed	Small Ground Mounted (<=500 kW)	Previously Developed	Solar Zoned	Rooftop	Brownfield	Landfill	Parking Lot Canopy	Dual Use Ag
Compensation Rate (\$/kWh)	Base Rate minus \$0.001/acre	Base Rate minus \$0.0005/acre	Base Rate			Base Rate plus \$0.02	Base Rate plus \$0.03	Base Rate plus \$0.04	Base Rate plus \$0.06	Base Rate plus \$0.06
Qualified Cat 1 Large Projects (MW)	N/A	N/A	5	60	356	89	10	29	36	3
Qualified Large Projects (MW)	192 (24%)	47 (6%)	421 (51%)			166 (20%)				

The majority of projects in Category 1 have avoided the Greenfield Subtractor by complying with local solar zoning, even though most of those projects are large ground mounted greenfields. A significant percentage of these projects are seeking a Community Shared Solar Adder.

Land Use Proposal

Revise Land Use Categories

1. Move solar specific local zoning from Category 1 Land Use eligibility to Category 2 for all new projects

- Move 225 CMR 20.05(5)(e)1.b.vi to CMR 20.05(5)(e)2
- Moving this section from Category 1 to Category 2 ensures that projects >500 kW sited on land that has not been previously developed are assessed the Greenfield Subtractor

2. Allow any project with a Public Entity Adder to qualify as Category 1

3. Increase Greenfield Subtractor x 5 for all new projects

Land Use Category	Current Subtractors (\$/kWh per acre impacted)	Proposed Subtractors (\$/kWh per acre impacted)
Category 2	\$0.0005	\$0.0025
Category 3	\$0.0010	\$0.0050

Projects with all required application documentation dated as of the filing date of the regulation or earlier will be exempt from new land use requirements.

Land Use Proposal

Location Based Adder Adjustments

Eliminate Rate of Decline for Location Based Adders

- Evidence has been presented that most of projects with Location Based Adders have fixed incremental costs that in some cases have actually increased since the regulation was initially promulgated (e.g. tariffs on foreign steel).
- Given the focus being placed on the development of solar in areas where it provides the most locational value from both a land use and electric grid standpoint, DOER is proposing that Location Based Adders remain at the levels they were initially set and not decline as more capacity is reserved.

Behind the Meter (BTM)/ C & I Proposals

Addressing Inequities

Most large Building Mounted and Canopy systems (60%) are being installed as standalone systems instead of being installed behind-the-meter

- Behind the meter systems provide a variety of additional benefits:
 - Interconnecting behind-the-meter also provides greater opportunities to pair with storage and reduce on-site demand
 - Encouraging more behind-the-meter interconnection with storage may help to alleviate interconnection issues
 - Creating new standalone service in addition to an existing service also requires additional utility work and may trigger higher interconnection cost
- DOER wants to encourage more behind-the-meter installations to provide greater grid benefits
- DOER has identified two main issues to pose a significant barrier to building BTM systems
 - The exported energy compensation and the overall impact it has on the financial viability of the system
 - The method of calculating the value of energy for the SMART incentive payment results in a negative incentive value for later capacity blocks

Behind the Meter (BTM)/ C & I Proposals

Exported Energy Compensation

The SMART Incentive Payment for BTM systems is calculated using an estimated value for the energy compensation, to determine a fixed \$/kWh payment

SMART Incentive = Total SMART Compensation Rate – Value of Energy

Value of Energy = (3 year avg. of Basic Service + Current Volumetric Rates)

- The value of energy is represents the value the customer receives for each kWh of avoided energy cost, so is equal to roughly full retail value
- If all of the solar energy produced is used at the same time as customer energy usage, the full SMART tariff value is received
- However, even if the system is sized to load, its almost impossible to avoid exporting energy to the grid
- If the system can only utilize the QF energy rate to be compensate for the exported energy, the value they receive is much lower than the value they are assumed to be receiving in the SMART Incentive calculation
- Facing value loss, the system will instead choose to interconnect as a standalone system
 - The SMART Incentive calculation for standalone systems does not represent the same value loss as BTM

Behind the Meter (BTM)/ C & I Proposals

Expand the AOBC to BTM Systems

Expand Alternative On-bill Credit (AOBC) availability to Behind-the-meter facilities

- Expanding AOBC makes all in compensation more equitable between standalone and behind-the-meter systems.
- DOER will revise the definition of Behind-the-meter Solar Tariff Generation Unit to reflect this change and the EDCs will revise their SMART tariffs accordingly.
- Encourage these systems to be built as Behind the Meter helps to achieve grid integration policy goals as well as reduces overall costs
- If these systems continue to be built as standalone, overall costs are higher, without achieve grid and customer benefits

Behind the Meter (BTM)/ C & I Proposals

Expand the AOBC to BTM Systems

500kW Building Mounted System, National Grid Block 1

Assuming 70,000 kWh production a month, with 65% energy used on site

Facility Type	Incentive Payment	Energy Compensation		Total Monthly Compensation
		Consumed Energy Savings	Exported Energy Compensation	
BTM Facility (QF)	\$2,650.20	\$7,950.60	\$750.00	\$11,350.80
BTM Facility (AOBC)	\$2,650.20	\$7,950.60	\$2,515.00	\$13,115.80
Standalone Facility (AOBC)	\$7,975.80	N/A	\$7,042.00	\$15,017.80

- Allowing Behind the Meter Systems access to the AOBC will encourage projects to build behind the meter, achieving greater benefits for the customer and the grid

Any behind the meter project that only has access to the qualifying facility tariff for net export energy compensation will receive less compensation than the same project that has access to AOBC, and will likely build the project as standalone instead of behind the meter.

Behind the Meter (BTM)/ C & I Proposals

Negative Incentive Values

- Expanding the AOBC helps to resolve one barrier for BTM systems, but the basic design of the SMART program presents another
- The SMART Incentive for BTM systems is calculated by subtracting the Value of Energy from the Total Compensation Rate for a System
- The Value of Energy is equal to full retail value, assuming all kWh produced by the system will be consumed on site behind the meter
- As SMART Capacity Blocks Decline in value, the Value of Energy becomes greater than the Total Compensation Rate
- Therefore, the calculation of the SMART Incentive Results in a negative value
- **BTM systems will receive \$0 in incentive payments**
- Systems will interconnect as standalone facilities to ensure an incentive payment is received

The incentive structure for behind the meter systems does not support project development when total compensation falls below the assumed energy savings. Systems will move to standalone in order to receive an incentive payment.

Behind the Meter (BTM)/ C & I Proposals

Negative Incentive Values

500 kW Building Mounted System, National Grid, Block 8

Assuming 70,000 kWh production a month, with 65% energy used on site

Facility Type	Incentive Payment	Energy Compensation		Total Monthly Value for System
		Consumed Energy Savings	Exported Energy Compensation	
BTM Facility (AOBC)	\$0.00	\$7,950.60	\$2,515.00	\$10,465.60
Standalone Facility (AOBC)	\$4,590.60	N/A	\$7,042.00	\$11,632.60

- The SMART Incentive for BTM systems is calculated by subtracting the Value of Energy from the Total Compensation Rate for a System
- The Value of Energy is equal to full retail value, assuming all kWh produced by the system will be consumed on site behind the meter
- As SMART Capacity Blocks Decline in value, the Value of Energy becomes greater than the Total Compensation Rate
- Therefore, the calculation of the SMART Incentive Results in a negative value
- **BTM systems will receive \$0 in incentive payments**
- Systems will interconnect as standalone facilities to ensure an incentive payment is received

The incentive structure for behind the meter systems does not support project development when total compensation falls below the assumed energy savings. Systems will move to standalone in order to receive an incentive payment.

Behind the Meter (BTM)/ C & I Proposals

Adjust the BTM Value of Energy

Adjust the Value of Energy calculation for Behind the Meter Systems to more accurately reflect real project usage

$$\text{Value of Energy} = \begin{array}{l} .65 * (3 \text{ year average basic service} + \text{current volumetric charges}) \\ + \\ .35 * (3 \text{ year average basic service}) \end{array}$$

- Expanding AOBC to BTM system means we know the value of those systems will be compensated for next energy exported, at the basic service rate
- The adjusted Value of Energy will increase the calculated Incentive Payment for behind the meter systems because the estimated value received from offsetting energy use and from receiving the AOBC will be lower than assuming all kWh are valued at full retail
- Behind the meter systems will be incentivized correctly, encouraging greater on site energy usage
- Encouraging more behind the meter systems will help offset the additional costs associated with building those same projects as standalone systems

Behind the Meter (BTM)/ C & I Proposals

Adjust the BTM Value of Energy

500 kW Building Mounted System, National Grid, Block 8

Assuming 70,000 kWh production a month, with 65% energy used on site

Facility Type	Incentive Payment	Energy Compensation		Total Monthly Value for System	Total Cost to Ratepayers
		Consumed Energy Savings	Exported Energy Compensation		
BTM Facility (AOBC)	\$0.00	\$7,950.60	\$2,515.00	\$10,465.60	\$2,515.00
BTM Facility w/adjusted VOE (AOBC)	\$1,129.29	\$7,950.60	\$2,464.70	\$11,544.59	\$3,593.99
Standalone Facility (AOBC)	\$4,590.93	N/A	\$7,042.00	\$11,632.60	\$11,632.60

Adjusting the value of energy in the incentive calculation for behind the meter systems encourages customers to build behind the meter systems, providing greater grid benefits, while reducing overall cost impact to ratepayers.

Increase Low Income Benefits

Low Income Participation Analysis

Current submitted and qualified applications for Low Income eligible rates (Low Income Base Rate, Low Income Community Shared Solar and Low Income Property) represent 2.5 % of all submitted and qualified SMART capacity.

- DOER aims to increase the number of Low Income CSS and Low Income systems
- DOER recognizes the complex challenge of expanding solar access to low income community
- Issues around increasing participation for eligible low income ratepayers include, but are not limited to:
 - Challenges in determining who is on an R-2 rate
 - Marketing to possible eligible customers
 - Ability of eligible customers to finance installations
 - Higher probability of older housing and therefore older roofs
 - Ability of eligible customers to enter into off-taker contracts
 - Higher percent of low income customers are renters

Increase Low Income Benefits

Proposals

1. Broaden the definition of Low Income Customer to include residents that meet the Low Income Environmental Justice Criteria

- The new definition increases the eligibility pool for the small ($\leq 25\text{kW}$) Low Income Base Compensation Rate and the Low Income Community Shared Solar Adder
- Utilizing EJ criteria helps to facilitate easier siting and marketing of these projects

2. Allow other Low Income Community Shared Solar models to qualify for the adder

- Alternative models may include participation through an EDC established program
- Alternative models may also include participation through a community aggregation

Solar + Storage Metering and Operational Changes

Metering Proposal

- Current metering requirements have not interfaced well with solar + storage business models and have resulted in situations in which solar + storage arrays may receive lower compensation than a facility that did not have storage
- Majority of solar industry stakeholders have advocated eliminating the utility ownership of production meters and requiring utilities to accept inverter meter readings
- DOER wants to ensure all solar output is accurately metered
 - For AC coupled systems
 - EDCs must accept inverter readings as long as the inverters contain revenue grade meters
 - If the inverter does not contain a revenue grade meter, all output on the AC side of the inverter must be metered using a revenue grade meter which should be placed as close to the inverter as possible
 - For DC coupled systems
 - Production may be measured (at the owner's option) behind the inverter using DC meters that meet revenue grade accuracy requirements
 - For DC coupled systems that measure production on the DC side of the inverter, a discount rate of 3% will be applied to the output to account for inverter losses that would have otherwise been measured if the system were AC coupled
 - Incentive payments for DC coupled arrays will be calculated on this discounted output total

Solar + Storage Metering and Operational Changes

Exempt Demand Response Participants

Eligible Energy Storage Systems participating in a retail level demand response program will be exempt from the 52 cycle requirement and 225 CMR 20.06(1)(e)4 will be modified as follows:

5. Operational Requirements. The Energy Storage System must discharge at least 52 complete cycle equivalents per year, **or must participate in a demand response program**, and must remain functional and operational in order for the Solar Tariff Generation Unit to continue to be eligible for the energy storage adder. If the Energy Storage System is decommissioned or non-functional for more than 15% of any 12-month period, the Department may disqualify the Solar Tariff Generation Unit from continuing to receive the energy storage adder.
- DOER wants to encourage solar plus storage projects to participate in demand respond programs
 - This change allows demand response participants to respond to these signals rather than have SMART program requirements override the DR program signals, based on recommendations from the EDCs

Public Off-taker Adder Changes

1. Increase the Public Off-taker adder from \$0.02/kWh to \$0.04/kWh

- Of projects larger than 25 kW, only 2% of capacity to date is planning to utilize the Public Off-taker adder.
- DOER has received considerable feedback from municipalities, state agencies, and project developers that work with these entities that the Public Off-taker adder is insufficient to both overcome the incremental costs associated with building projects on public land and to provide enough value to the public entity to make the investment attractive.
- Given these comments as well as the added benefits of deploying solar on public lands and property, DOER proposes to increase the Public Off-taker adder to \$0.04/kWh to encourage more solar deployment in these areas.

2. Allow Public Off-taker STGUs to qualify for SMART at least six months earlier

- Public off-taker applicants can obtain a Statement of Qualification by providing evidence that they have been awarded a contract with a public entity, allowing for an 18-month Reservation Period

3. Qualify Public Off-taker STGUs under Category 1 Land Use

New Preferred Interconnection Adder/ Subtractor

- Working with EDCs to obtain data on where locational benefits exist and recommendations on size of adders/subtractors
- Adder will apply to projects located on ideal grid locations that could support and/or benefit from additional solar
- Subtractor will apply to projects interconnected to locations identified as too congested

Strengthen Consumer Protection Standards

Review customer contracts more closely to ensure customers clearly understand the terms of contracts, with penalties applied to delinquent applicants

- DOER will perform periodic audits of customer disclosure forms submitted with SMART applications not applying for low income incentives
- The customer disclosure form will be reviewed against its accompanying contract, as well as the current utility rate for the customer's rate class
- Applications with signed customer disclosure forms containing details that do not match details of the customer contract will be required to correct the form and the applicant will receive a warning from DOER
- Applications for projects serving Low Income Customers that are shown to not provide direct savings will be rejected and the applicant will receive a warning from DOER

Eligible projects serving Low Income Customers must demonstrate the customer is receiving direct savings

- Savings may be demonstrated through a no cost allocation of benefits or clear savings to low income resident off-takers

Strengthen Consumer Protection Standards

Three Strikes, You're Out

- After receiving two warnings, if the same applicant provides a third customer disclosure form with incorrect details, that applicant will be barred from submitting any new SMART application for 1 year
- After receiving two warnings, if the same applicant submits a third application serving a Low Income Customer that does not provide savings, that applicant will be barred from submitting any new SMART application for 1 year
- The applicant, individuals submitting on behalf of the applicant, or any other affiliated parties, will be notified that their accounts will be immediately suspended

Dual Use Agricultural Systems Updates

Agricultural Solar Tariff Generation Unit

- Update regulation by updating the Land In Agricultural Use definition, striking the definition of Prime Farmland and replacing it with a definition of Important Agricultural Farmland, as follows:

Land in Agricultural Use. All land as defined under M.G. L. c. 61A, §§ 1 & 2, ~~enrolled in a program established pursuant to M.G.L. c. 61A,~~ and land that had been enrolled in a program established pursuant to M.G.L. c. 61A within the past five years.

Important Agricultural Farmlands. Means those soils found to be Important Farmlands pursuant to 7 C.F.R. § 657.5, that includes Prime Farmlands, Unique Farmlands and Additional Land of State Importance.

- Add DC size limitation to regulation stating that Agricultural STGUs may be no larger than 2.5 MW DC.
- Update the Agricultural STGU Guideline to add language to clarify agricultural yield requirements and increase minimum sunlight requirements, consistent with MDAR recommendations.

New Pollinator Adder

- Proposed to be \$0.0025/kWh (approximately \$3,500/MW per year)
- Would apply to projects that are awarded pollinator certification by UMass Amherst Clean Energy Extension
- Existing and new projects may apply for this adder

Eligibility Updates

Replacement Systems

Rules for Replacement Systems

- Current rules prohibit replacement of an existing pre-SMART system unless the existing system was non-operational for 12+ months prior.
- Propose modifying rules to allow for prorated replacement and expansion of existing systems.
- **Example:**
 - A 3 kW PV facility installed in 2010 with funding from the SREC I and Commonwealth Solar II Rebate Programs is replaced with a 5 kW solar array that seeks qualification under the SMART Program
 - The facility may qualify under SMART, but only for the portion of its output associated with the incremental capacity (2 kW)
 - It would therefore receive a capacity reservation that is 40% of its total capacity and would receive incentive payments for 40% of its output at the full incentive payment rate to which it is entitled

Eligibility Updates

Community Shared Solar

Community Shared Solar/ Low Income CSS

- Applicants will not be required to provide Customer Disclosure Forms for the 1 or 2 customers that take up to 50% of a project's output (aka “anchor tenants”)
- Adjust the definition of CSS and LICSS to allow for projects to participate through an EDC model or community aggregation
 - If such a model does not require customer contracts, no customer disclosure forms would be required
- Applicants that reserve the CSS Adder must demonstrate compliance with the adder when operational
 - Applicants that do not may lose their queue position
 - DOER will offer a period after implementation of rule when projects may remove CSS Adder with no consequence

Proposed Schedule

- May / June/ July 2019 – Hold stakeholder meetings
- September 2019- Present findings of 400 MW review and collect comments on straw proposal
- September- Mid November 2019– Review draft regulation at DOER/EEA/ANF
- Mid-late November 2019-File emergency regulation
- Mid February 2020- Regulation Promulgated, DOER changes permanently in effect
- Early to mid April 2020– File revised tariffs with DPU for approval
- Late 2020- Tariff changes in effect

APPENDIX: Proposed Technical Corrections, Statistics and Further Analysis

SMART Application Statistics

Small Projects (<= 25kW AC)

Electric Distribution Company (EDC)	Accepting Applications for Block:	Block Size (MW)	Total Available Capacity (MW)	Total Interconnected Capacity (MW)	Total Qualified Non-Operational Capacity (MW)	Total Capacity Under Review (MW)	Total Capacity Qualified or Applied For (MW)	Total Remaining SMART Capacity (MW)
Eversource MA East	2 of 8	18.3	146.4	12.9	10.8	2.7	26.4	120
Eversource MA West	4 of 8	3.1	25.2	4.8	4.8	1.2	10.8	14.4
National Grid (Massachusetts Electric)	3 of 8	18	144	16.5	19	6.3	41.8	102.2
National Grid (Nantucket)	1 of 2	0.6	1.2	0.06	0.02	0	0.08	1.12
Unitil	2 of 4	0.8	3.2	0.5	0.6	0.35	1.45	1.75
Totals			320	34.76	35.22	10.55	80.53	239.47

Large Projects (>25 kW AC)

Electric Distribution Company (EDC)	Accepting Applications for Block:	Block Size (MW)	Total Available Capacity (MW)	Total Interconnected Capacity (MW)	Total Qualified Non-Operational Capacity (MW)	Total Capacity Under Review (MW)	Total Capacity Qualified or Applied For (MW)	Total Remaining SMART Capacity (MW)	Total Capacity Under Waitlist Review (MW)	Total Qualified Waiting List (MW)
Eversource MA East	3 of 8	73.2	585.7	7.1	115.2	27.1	149.4	436.3	N/A	0
Eversource MA West	Waiting List	12.6	100.7	11.5	87.7	N/A	99.2	1.5	0	36.5
National Grid (Massachusetts Electric)	Waiting List	72	576.2	14.9	523.8	37.5	576.2	0	11.7	0
National Grid (Nantucket)	1 of 2	2.4	4.8	0	1	0	1	3.8	N/A	0
Unitil	Waiting List	3.2	12.6	0	12.4	N/A	12.4	0.2	0	6.5
Totals			1280	33.5	740.1	64.6	838.2	441.8	11.7	43

Energy Storage Adder

Current Tranche	Total MW (Solar) Paired	Total MW of Storage	Total MWh of Storage
4	317.6	222.4	994.2

Technical Correction: Clarifying Land Use and Segmentation Rules

Project segmentation rules will be modified to clarify that Canopy STGUs are subject to them as follows:

(f) Project Segmentation. No more than one ~~Building Mounted Generation Unit on a single building, or one ground-mounted~~ Solar Tariff Generation Unit on a single parcel or contiguous parcels of land, shall be eligible to receive a Statement of Qualification ~~as a Solar Tariff Generation Unit~~, with the exception of Building Mounted Solar Tariff Generation Units. No more than one Building Mounted Generation Solar Tariff on a single building shall be eligible to receive a Statement of Qualification.

Technical Correction: Clarifying Land Use and Segmentation Rules

The Category 1 Non-agricultural Land Use eligibility criteria will be modified to clarify that Canopy STGUs and Floating STGUs qualify as Category 1 Land Use as follows:

b. Category 1 Non-agricultural. Solar Tariff Generation Units not located on Land in Agricultural Use or Prime Agricultural Farmland that meet one or more of the following criteria will be designated as Category 1:

- i. Ground-mounted Solar Tariff Generation Units with a capacity less than or equal to 500 kW;
- ii. Building Mounted **Solar Tariff** Generation Units;
- iii. Solar Tariff Generation Units sited on Brownfields;
- iv. Solar Tariff Generation Units sited on Eligible Landfills;
- v. **Floating Solar Tariff Generation units**
- vi. **Canopy Solar Tariff Generation Units**
- vii. Solar Tariff Generation Units that are ground-mounted with a capacity greater than 500 kW and less than or equal to 5,000 kW that are on land that has been previously developed.

Technical Correction: Clarifying Land Use and Segmentation Rules

The Category 3 Land Use criteria will be modified to clarify that any project sited on Land in Agricultural Use or Prime Agricultural Farmland that is not eligible for Category 1 Ag will be placed into Category 2 or 3 Land Use as follows:

3. Category 3 Land Use. Solar Tariff Generation Units not otherwise designated Category 1 or Category 2 ~~that are ground mounted with a capacity greater than 500 kW and less than or equal to 5,000 kW~~ shall be designated as Category 3 Land Use.