



June 1st, 2020

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street
Suite 1020
Boston, MA 02114

Re: Summit Ridge Energy comments regarding MA SMART Emergency Regulations

Introduction

Summit Ridge Energy ("SRE") is a leading developer, owner, and operator of solar projects in the US. The core team has been a strong force within the U.S. commercial solar market for years and was instrumental in the creation of virtual solar power purchase agreements and associated financing structures used in Massachusetts over the past decade. SRE's Principals has been involved in the development and financing of renewable energy projects serving the commonwealth since the SREC I program. Summit Ridge Energy has leveraged this experience to launch Summit Ridge Capital, a dedicated funding platform that is actively acquiring renewable assets and pre-operational projects within the rapidly growing solar and storage markets. SRE has been closely following the SMART 400MW Review process and is excited by the opportunity to continue developing and operating projects in Massachusetts to help meet the commonwealth's forward-thinking energy goals. SRE is pleased to provide some brief feedback below on the proposed Emergency Regulations.

Land Use Restriction Concerns

SRE is very pleased with the 1600MW expansion of the SMART program, but has concerns that the onerous land use restrictions being proposed will not allow Massachusetts to reach this goal. The addition of the "Critical Natural Landscape", "Core Habitat", and "Priority Habitat" GIS screens, which while well intentioned, removes vast swathes of the commonwealth's developable are for solar projects. SRE would recommend further discussions

and working groups with both conservation and solar developers to come to an agreement on how both groups can meet their goals.

Grandfathering Projects in Development

Many developers, including SRE, have projects that have been in development since as early as 2017, but have not yet received a Statement of Qualification and achieved commercial operation because of the lengthy interconnection delays seen in Eversource East territory. These projects were sited within the land use guidelines of the time, and subject to the siting adders and subtractors outlined in the original SMART guidelines. The application of the proposed land use restrictions to these projects would wipe out a large pipeline of projects that were in development far before these Emergency Regulations were conceived. SRE implores the DOER to protect this pipeline of projects by grandfathering projects into the previous land use guidelines as long as they have applied for interconnection before the release of the Emergency Regulations.

Support for “Joint Solar Parties” Comments

Furthermore, SRE would like to voice our support for the comprehensive comments provided by the “Joint Solar Parties”, which includes the Solar Energy Industries Association, the Coalition for Community Solar Access, the Northeast Clean Energy Council, Mass Solar, the Solar Energy Business Alliance of New England, and Vote Solar. SRE has participated in the process as a leading member of CCSA, and believes the Joint Solar Parties comments represent a well-rounded view on the proposed regulations and provide recommendations that would make for a fair improvements and changes which will help sustain the success of the SMART program.

Conclusion

Summit Ridge Energy looks forward to continue to develop clean energy resources in the commonwealth of Massachusetts. While we believe changes to the SMART program are necessary to improve the program, we strongly believe that the proposed land use regulations

have an extremely detrimental effect on the commonwealth's existing solar project development pipeline. SRE appreciates the opportunity to provide comment and looks forward to continued engagement with the DOER.

Regards,

A handwritten signature in dark ink, appearing to read 'Jarryd', with a stylized flourish extending to the right.

Jarryd Commerford

Principal

Summit Ridge Energy

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