

## SMART Public Comment

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To: SMART, DOER (ENE) <doer.smart@mass.gov>

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We support the comments in the CCSA, SEIA, NECEC, SEBANE and Vote Solar "Grace Period" letter, and ask DOER to swiftly issue acceptance of the proposal.

We have several projects in MA under development and construction where Duke Energy would be the long term owner operator, among them what would be the first community solar projects for Duke Energy. Bringing forward the declaration date of confirming the CS adder to June 15 would, in normal times, be an unnecessary and arbitrary ruling that could materially impact projects. Doing so during the current Covid pandemic while there are restrictions in place to engage in the very activities that would be required to meet the community solar threshold would be overly burdensome and puts developers and community solar aggregators in a no-win situation.

On one community solar project we are nearing mechanical completion and have been told by the utility at varying times that the project could be interconnected in October, or September, or July, or August. We have made headway on subscriptions, and have made significant investment in the project for construction and interconnection as well as subscription based on the assumption of Community Solar. In normal times, we believe we would have eclipsed the 90% threshold by now. We are pursuing multiple alternative subscription avenues than originally intended to maintain our CS designation and meet the requirements. However, without knowing when the utility would in fact complete its work, or when a resolution of more normal subscription activities would begin, we have limited visibility as to whether we will reach the threshold by the Incentive Completion Date. Given that, we should not be expected to choose by June 15<sup>th</sup> between i) taking the risk of incurring significant economic impairment by losing the queue position after striving to meet the threshold and falling just short, and ii) giving up the community designation and accepting the lower QF rate.

With the Grace Period proposal enacted we could proceed to move as quickly to bring the project online while completing the subscriptions. We believe this is in the best interest of all stakeholders.

Thank you,  
Owen

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