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Ms. Kaitlin Kelly  
Manager of Solar Programs  
Massachusetts Department of Energy Resources  
100 Cambridge St., Suite 1020  
Boston, MA 02114

Dear Ms. Kelly:

In the proposed SMART regulations<sup>1</sup>, there is an error in the formulas in sections 20.08(2) and 20.08(3). The formula in 20.08(2) is given as:

$$\begin{aligned} & \text{[Redacted]} = (\text{[Redacted]} + \text{[Redacted]} - \text{[Redacted]}) - (\text{[Redacted]} + \text{[Redacted]} + \text{[Redacted]} + \text{[Redacted]}) \end{aligned}$$

The three terms in the first set of parentheses (single underlining) are expressed in terms of dollars per kWh. However, the three terms in the second set of parentheses (double underlining) are expressed in terms of dollars. The formula is therefore inconsistent with respect to units.

Similarly, the formula in 20.08(3) is given as:

$$\begin{aligned} & \text{[Redacted]} = (\text{[Redacted]} + \text{[Redacted]} - \text{[Redacted]}) - [0.65(\text{[Redacted]} + \text{[Redacted]} + \text{[Redacted]} + \text{[Redacted]}) + 0.35(\text{[Redacted]})] \end{aligned}$$

The three terms in the first set of parentheses (single underlining) are expressed in terms of dollars per kWh. However, the five terms in the set of brackets (double underlining) are

<sup>1</sup> <https://www.mass.gov/doc/225-cmr-2000-smart-redline-0>, update of 5-4-20

expressed in terms of dollars. This formula is therefore also inconsistent with respect to units.

Can you explain the inconsistencies in 20.08? Thank you very much for your assistance.

Sincerely yours,

David Heimann  
Energy Committee  
Sierra Club Massachusetts Chapter

P.S. – The assertion can be made that the various charges (service, distribution, transmission, and transition) in each of the formulas are actually expressed in dollars per kWh instead of in dollars, in which case both formulas are consistent. However, in that case the verbal specification of the compensation in 20.08(2) would be inconsistent, i.e.,

... shall be equal to the total Solar Tariff Generation Unit's Base Compensation Rate plus any Compensation Rate Adders minus any Greenfield Subtractor [A], multiplied by the total kWh generated by the Solar Tariff Generation Unit in the utility billing period [B], minus the sum of the Owner's current distribution kWh charge, current transmission kWh charge, current transition kWh charge, and the average of the basic service kWh charge in the prior three calendar years [C].

[A] is expressed in units of dollars per kWh, [B] is expressed in units of kWh, and [C] would now be expressed in dollars per kWh. The verbal specification -- summarized as "[A], multiplied by [B], minus [C]" -- itself now would be inconsistent.