

June 1, 2020

IHI Energy Storage
100 N. Riverside Plaza,
Suite 2200, Chicago, IL 60606
Tel: 312-724-7924

Patrick Woodcock, Commissioner

Massachusetts Department of Energy Resources

100 Cambridge Street, 10th Floor

Boston, MA 02114

Re: SMART Program Emergency Regulations

Dear Commissioner Woodcock,

IHI Energy Storage appreciates the opportunity to comment on DOER's April 14, 2020 SMART Emergency Regulation filing. IHI is a subsidiary of IHI Corporation, a 165-year-old organization with deep energy industry experience. IHI Energy Storage provides storage solutions for many Massachusetts solar + storage SMART projects. For us, the SMART program is not just a solar program - it is the strongest driver of energy storage deployment in Massachusetts.

Although IHI supports many of the provisions in the Emergency Regulations, IHI Energy Storage strongly opposes the new land use prohibitions and increase to the greenfield subcontractor. These provisions appear to be targeted at the larger, more efficient projects that offer the best opportunity for deploying paired solar and energy storage in Massachusetts. In addition, we note that 88% of all the storage capacity currently reserved under SMART is expected to be paired with the type of larger ground-mounted projects that the new Emergency Regulations would largely prohibit. There are compelling economic and practical reasons why storage is paired with ground-mounted solar: larger projects sited away from populated areas are more able to cost-effectively deploy larger and longer-duration batteries than are smaller rooftop or canopy projects. By effectively closing off the ground-mounted solar market in Massachusetts, DOER will, perhaps inadvertently, largely shut down the energy storage market that has been growing alongside this sector.

For these reasons, IHI recommends that DOER remove the new land use prohibitions or, at a minimum, engage in a robust stakeholder process to weigh the pros and cons of these unprecedented restrictions before adopting them in emergency fashion. In addition, IHI urges DOER to adopt more generous grandfathering provisions for any changes to the land use rules or subcontractors to avoid disrupting mature development pipelines for solar and energy storage projects.

Thank you for your consideration,



Jamal Burki - SVP

IHI Energy Storage