

June 01, 2020

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

RE: SMART Public Comments: Set-aside for STGUs serviced by NSTAR Electric Company

Dear Commissioner Woodcock,

We write to express our concern with combining the Eversource Energy capacity blocks. We strongly urge the Department of Energy Resources to include a set-aside for Solar Tariff Generation Units located in the service territory formerly designated as NSTAR Electric Company. Each combined Eversource Energy capacity block should have a minimum of 75% of its total available capacity reserved for STGUs located in the service territory formerly known as NSTAR.

NSTAR End-use Customers account for 85% of the combined total electric load within Eversource Energy, according to the 2016 data used to determine the amount of capacity available in each Distribution Company's service territory. An NSTAR STGU set-aside would be consistent with DOER's communication and intention throughout the development and execution of the Solar Massachusetts Renewable Target (SMART) Program, and it would allow for:

I. Direct and Proportional Benefit to Ratepayers & their Communities

The benefits of installed capacity extend beyond SMART incentive payments. They include energy savings, jobs, property taxes, local ownership, and local economic development. Combining the Eversource Energy capacity blocks may result in an overwhelming majority of capacity to be installed in the WMECO territory, denying the benefits NSTAR ratepayers and their communities had previously been reserved.

II. Reduction of Burden on Utility Infrastructure

NSTAR has both the greatest amount of ratepayers and the highest density. Increasing solar capacity within this territory has the greatest potential to reduce peak demand and the need for infrastructure investments while increasing grid reliability.

A 75% set-aside for STGUs located in the service territory formerly known as NSTAR would demonstrate the DOER's commitment to a diversity of STGU types across geographies and ratepayers. More importantly, it would guarantee an opportunity for the benefits of the SMART Program and the general benefits of increased renewable energy to be proportionately distributed throughout the Commonwealth.

Thank you for your consideration in this matter.

Sincerely,

Todd Fryatt
President, ECA Solar



Daniel Mello Guimaraes
CEO & Co-Founder, Boston Solar



Bob Kiley
CEO, Ace Solar



Jonathan Abe
CEO, Sunwealth



Benjamin Underwood
Co-CEO, Resonant Energy



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