

**Congress of the United States**  
**Washington, DC 20515**

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

May 28, 2020

Dear Commissioner Woodcock,

We are writing to you relative to the Commonwealth's Solar Massachusetts Renewable Target (SMART) program and 225 CMR 20.00 emergency regulations. We commend the Baker Administration and Department of Energy Resources (DOER) for its promotion of renewable energy in Massachusetts and the precious jobs those industries represent. We also appreciate your desire to expand solar in the Commonwealth.

We would like to address a few issues in DOER's emergency SMART regulations that could have an extremely detrimental impact on communities that we represent:

- **Land Use:** New land use provisions in the regulations will reduce ground mounted solar development in the communities we represent and have a severe negative impact on the agricultural communities in our districts. Large scale ground mounted solar generation is essential for reducing greenhouse gas emissions and addressing climate change. Due to these concerns we request that DOER re-evaluate its regulations and consider again the negative impacts they will have on the Commonwealth's farm communities.
- **Grandfathering:** Developers and landowners have invested millions of dollars and precious time stewarding projects forward should not be penalized by new regulations. COVID-19 has had a sweeping impact on industries all across Massachusetts, but solar project developers should not be punished due to the delays caused by this terrible pandemic. Projects and developers that have followed the rules thus far should be assisted, rather than punished. It is our understanding that around 70 projects of over 475MW could be at risk by new regulations. This is an unnecessarily destructive result of these changes and all due care should be used to consider these implications before moving forward in finalizing the rules.

COVID-19 has had a seismic impact on the solar industry and reports suggest that over 4,000 jobs have already been lost. We ask that DOER take into consideration these consequences and do whatever is in its power and jurisdiction to protect these local jobs and help get the solar industry back on track in Massachusetts.

We appreciate the time and consideration you have given to the Commonwealth's SMART program and ask for you to further examine these regulations to avoid the unintended consequences of limiting the deployment of solar power in Massachusetts. We look forward to continuing our work together to foster and promote renewable energy technologies in Massachusetts. If you have any questions about this letter please contact Natasha Silva in Congressman Keating's office at: [Natasha.Silva@mail.house.gov](mailto:Natasha.Silva@mail.house.gov) and Patrick O'Connor in Congressman Neal's office at: [Patrick.oconnor@mail.house.gov](mailto:Patrick.oconnor@mail.house.gov).

Sincerely,

A handwritten signature in black ink, reading "William R. Keating". The signature is fluid and cursive, with the first name "William" and last name "Keating" clearly legible.

William R. Keating  
Member of Congress

A handwritten signature in black ink, reading "Richard E. Neal". The signature is fluid and cursive, with the first name "Richard" and last name "Neal" clearly legible.

Richard E. Neal  
Member of Congress