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May 19, 2020

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

Comments of SMART Emergency Regulations

Independence Solar appreciates the Department taking steps to expand the SMART program to grow the Commonwealth's economy, create jobs, and make progress toward the Commonwealth's clean energy goals. We would like to take this opportunity to request one important change to the regulations as currently proposed.

20.05(5)(k) Energy Storage Requirement for projects > 500 kW should not apply to Building Mounted and Canopy STGU's.

1. We fully support the Department's objective to expand storage paired with solar as much as possible, and the Storage Adder is effective at encouraging adoption of storage wherever possible.
2. However, many developed sites (schools, office parks, parking structures, etc..) that are ideal candidates for hosting solar arrays, might not be feasible to pair with storage due to a number of factors, including space constraints, permitting restrictions, host concerns with the technology, operating requirements, etc..
3. The Department is clearly trying to steer solar development to these types of developed sites with new land use restrictions, so to then put up a potential roadblock for large solar arrays on rooftops and parking lots, that for one reason or another cannot accommodate a storage system, seems to be counterproductive to the Department's own objectives.
4. While there is an ability to apply for a good cause exemption, that is a cumbersome and time-consuming process that a significant number of potentially well suited SMART project opportunities should not have to be subjected to in order to be able to proceed with the development of a large building or canopy mounted solar array.

Independence Solar would like to thank the Department for its consideration of our comments.

Sincerely,

James Schwartz
Vice President
Independence Solar, LLC