



June 1, 2020

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

**Re: City of Boston Public Comment on SMART Program (225 CMR 20.00) Revised
Emergency Rulemaking Language**

The City of Boston appreciates the opportunity to comment on the latest emergency revision to 225 CMR 20.00: Solar Massachusetts Renewable Target (SMART) Program. Mayor Martin J. Walsh has pledged to make the City of Boston carbon-neutral by 2050. The continued success and expansion of the SMART Program will help us meet that goal by incentivizing the deployment of zero-carbon electricity generated by solar arrays of all types and scales.

1. Program Expansion: We support the decision to expand the program from 1,600 to 3,200 MW of new solar generating capacity, as outlined in section 20.05 (1) of the Program text.
2. Block Allocation for Low-Income Customers: The City of Boston asks the Department of Energy Resources to revisit the capacity percentage reserved for low income community shared and low income property solar tariff generation units as outlined in section 20.05 (3)(d) of the Program text. Low-income residents, people of color, and environmental justice communities have historically been the least likely to benefit from the improved ambient air quality and lower electricity bills associated with new solar development. The current language of 20.05 (3)(d) currently allocates 5% of all block capacity to low-income customers. Comparatively, The New York State Energy Research and Development Authority (NYSERDA) recently filed a petition to request additional funding for their NY-Sun Program¹ (similar to the SMART Program) which would allocate \$135 million (24 percent) out of a total requested \$573 million to explicitly benefit low and medium income (LMI) customers, affordable housing, environmental justice communities and disadvantaged communities. The Commonwealth should

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<https://www.jdsupra.com/legalnews/nyserda-seeks-573-million-and-policy-95490/>

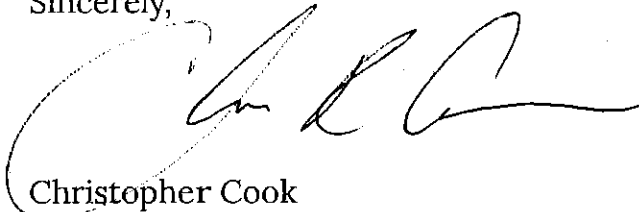
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increase the capacity percentage of all blocks allocated for low-income customers to at least 20%.

3. Community Solar Bill Credit Allocations for Municipal Aggregation Programs: The City of Boston's application to begin its Municipal Aggregation program is awaiting final approval from the Department of Public Utilities on our Municipal Aggregation Plan. The program will be a key component for advancing its Climate Action Plan. The City appreciates and supports the language in section 20.06 (1)(f)(4) and 20.06 (1)(h)(5) that allows municipal load aggregation programs to allocate bill credits through a community shared solar program, which will provide an additional means of incorporating additional non-emitting generation into the generation mix in Massachusetts. This is an additional reason to increase the Block Allocation discussed in Paragraph 2 above.
4. Built Environment Project Siting: As a city with limited open space for major ground-mounted utility-scale solar developments but substantial rooftop area and parking lots available for potential solar development, we ask that the Department develop regulatory approval processes that simplify the deployment of projects in complex built environments.

The City of Boston looks forward to continued collaboration on matters relating to the proliferation of solar electricity generation in the City of Boston and the Commonwealth of Massachusetts.

Sincerely,



Christopher Cook
Chief of Environment, Energy, and Open Space
City of Boston