



June 1, 2020

Eric Steltzer
Director, Renewable and Alternative Energy Division
Massachusetts Department of Energy Resources
100 Cambridge St.; Suite 1020
Boston, MA 02144

Dear Mr. Steltzer:

Please accept the following comments regarding the *Solar Massachusetts Renewable Target (SMART); 225 CMR 20.00 Emergency Regulations and Proposed Revisions*. We are encouraged by the changes to the program in the emergency regulations, however we believe there is a need for further changes to address the challenges Nantucket uniquely faces as an island community and Public Entity, within National Grid's distinct Nantucket Electric territory.

Nantucket has an especially compelling need to develop solar energy, as National Grid energy forecasts show Nantucket's peak load growing five times the statewide average. Due to this significant load growth, Nantucket was targeted by National Grid for a Non-Wires Alternative project in 2018 to help defer a costly and disruptive third undersea transmission cable through traditional and alternative peak reduction strategies—among them being the need for increased renewable energy and battery energy storage systems.

As emphasized in our earlier comments, there are many unique challenges to successfully developing solar on Nantucket, complicated by the island's remoteness 30-miles offshore and designation as a National Historic Landmark. As an island Town and County, Nantucket is strictly limited in our available land area; in fact, developable land is diminishing at an alarming rate due to coastal erosion and rising sea-levels. As a result, suitable development sites are extremely limited, highly priced, and subject to a broad-range of competing local interests. Despite these challenges, Nantucket has been working diligently since 2011 to identify sites for solar development, and now energy storage, to reduce the island's carbon footprint, stabilize utility costs, and increase the island's energy resiliency.

Provided below are items in the Emergency Regulations that we ask the Department of Energy Resources to consider to improve the viability of solar development on Nantucket:

Additional SMART Blocks

Nantucket supports the addition of 1600 MW to the SMART program. In the rest of the National Grid's Massachusetts Electric Co. territory, Blocks 9-16 will be created, but there is uncertainty regarding the additional capacity within the separate Nantucket Electric Co. territory. Since Nantucket's allotment did not include the initial 8 blocks, Nantucket requests that the Department not skip ahead to Block 9 in our territory.

Instead, we are requesting the new capacity start in Block 3 for National Grid Nantucket. Based on the additional 6.438 MW AC in the National Grid Nantucket territory, we are requesting that 3.219 MW AC be allocated to Block 3 and 3.219 MW AC be allocated to Block 4.

SMART Compensation- Block Decline

The Emergency Regulations changed the Base Compensation Rate block decline for Behind-the-Meter (BTM) and Front-of-the-Meter (FTM) systems. BTM systems are set to decline block-to-block at 2 percent and drop at 4 percent block-to-block for FTM systems. We are requesting that the Nantucket incentive decline block-to-block at 2 percent for BTM systems and 4 percent for FTM systems to match the rest of the National Grid Territory. Additionally, we are requesting the 4% block decline to start at the current block, which is Block 1.

Statement of Qualification Reservation Periods

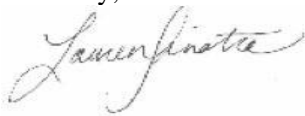
Nantucket requests that the Public Solar Tariff Generation Units (STGUs) base reservation period be increased from 18 to 24-months. Public STGUs can apply to SMART before the interconnection study process is complete, meaning that the reservation period should account for this additional step in the development process.

Land Use

The Town of Nantucket has identified a property at our water company for solar and energy storage development, which is currently in the permitting stages. The energy generated from this solar project will produce renewable energy on the island and help further mitigate the need for costly local distribution upgrades and an additional undersea transmission cable. We therefore support and emphasize the importance of the Public Entity STGU's eligibility as a **Category 1 Non-agricultural Land Use determination**, as outlined in the document released by the Department of Energy Resources titled: *"Guideline Regarding Land Use, Siting, and Project Segmentation."*

We thank the Department of Energy Resources for their work on revising the SMART regulations and are hopeful that modifications to the current program can further expand the generation of clean, locally-generated energy for the Town and County of Nantucket.

Sincerely,



Lauren Sinatra
Energy Coordinator
Town of Nantucket
(508) 325-5379
LSinatra@nantucket-ma.gov

CC: C. Elizabeth Gibson, Town Manager