



Coalition for Community Solar Access SMART Testimony

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Thank you to the Department, and specifically Commissioner Woodcock, for the opportunity to provide testimony on the SMART Emergency Regulations.

My name is Erika Niedowski and I am Northeast Director for the Coalition for Community Solar Access. CCSA represents dozens of community solar companies that are developing clean energy projects throughout the Commonwealth, with many members headquartered right here in Massachusetts.

CCSA appreciates DOER's 1600-megawatt expansion of SMART. Doubling the program's capacity will help us fulfill our mission of expanding access to solar regardless of housing type or income level. However, CCSA and its industry partners plan to file joint comments highlighting various issues that could result in critical projects being cancelled, the loss of affordable clean energy and perhaps most importantly, significant and unnecessary harm to our economy at a moment we can least afford it.

In the interest of time I will concentrate my remarks on two of the issues while my association colleagues tackle the others. As an industry, we will be submitting joint written comments that include our position on all the issues you will hear from us today.

The first issue is around the new land use restrictions. While CCSA understands and appreciates the concerns around land conservation, the regulation goes too far – effectively prohibiting ground-mounted solar projects in many communities, particularly in western and southeastern Massachusetts. The Critical Natural Landscape layer alone takes 1.8 million acres of land off the table, even though other forms of development would still be allowed.

Ground-mounted community solar projects that are supported by municipalities, landowners, the Farm Bureau, cranberry growers, and others across the state would no longer be viable. One such example is a solar development that would be sited on a parcel of land owned by a local cranberry farmer. It has been in project development for over two years and would provide tax

revenue of \$750,000 over 20 years to the host municipality. Under the new rules, this project would be cancelled and the cranberry farmer and local municipality would lose a valuable economic development opportunity.

The second issue concerns community solar subscription requirements. We request that DOER allow a 12-month grace period for community solar and low-income community solar projects to achieve 90 percent subscription. This grace period would be a simple administrative change that will not increase program costs or impact ratepayers in any way. CCSA and its industry colleagues have sent a separate letter to the Commissioner providing further details about the request.

As noted, we also have concerns about other provisions, including Grandfathering Milestones, SoQs and resetting base rates. While these provisions may sound technical in nature, collectively they could halt the development of nearly 70 local solar projects totaling 477 megawatts. Losing these projects would cost the Commonwealth 1,500 jobs and \$731 million in economic investment. This is on top of the nearly 4,300 solar industry jobs that SEIA projects the state will lose through June because of COVID-19.

Given the significant economic emergency unfolding across Massachusetts, the state simply can't afford to implement rules that will essentially abandon shovel ready, local economic development opportunities. These are opportunities that leverage hundreds of millions of dollars of private capital to create jobs, income opportunities for farmers and landowners, and tax revenue for municipalities across the Commonwealth.

As such, we are asking DOER to reconsider the most restrictive measures in these regulations – and look forward to working productively with you in the weeks ahead.

Thank you for your time today and for the opportunity to participate.