

The SMART Program is not smart enough

Judith Stetson (juds3@comcast.net) Sent You a Personal Message <automail@knowwho.com>

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To: SMART, DOER (ENE) <doer.smart@mass.gov>

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Dear The Hon. Patrick Woodcock,

I live in a scientific community on Cape Cod. The Woods Hole Research Center in Falmouth has been doing basic, detailed research on the changing global climate for years. It has been warning us that we have about TEN YEARS LEFT before we will not be able to stop the climate of the earth from tilting into being uninhabitable for humans and other creatures!

I am pleased that the DOER is seeking public comment on the new SMART regulations and want to take this opportunity to comment on a couple of needed improvements in the interest of equality, jobs, and the attainment of the state's clean energy obligations.

Solar Access for Low Income and Minority Populations Requires Additional Policy Support.

Equality must be a core tenant of our plans for an economic recovery from the COVID-19 pandemic. COVID-19 has put a spotlight on the extensive economic inequality that exists as well as directly impacting the health of marginalized communities most. We need to ensure that these communities are central to a strategy of "building back better". Making the necessary policy changes can result in a large increase in solar employment in the state (jobs) and reduce electricity cost for our most needy population. In addition to the low income provisions in the proposed SMART regulations, DOER needs to address three barriers:

Complicated contracts. Shared solar requires complicated contracts that govern solar credits on ratepayer bills. These contracts make it hard for low-income households to receive guaranteed savings. Furthermore, low-income residents, and all residents, are reluctant to sign a contract because there have been scams related to electricity rates. DOER should amend the Massachusetts policy so that contracts and solar credit sales are no longer needed to share the benefits of solar with low-income households. Instead, solar credits can be shared at no-cost and without a contract with low-income households thereby guaranteeing savings and resolving consumer protection concerns. One solution is allowing solar credits to appear directly on utility bills.

Sharing solar credits between load zones and utilities. The majority of low income ratepayers are in urban areas where siting shared solar facilities is challenging or impossible, with the result that it must be possible for low income shared solar facilities to be in a different load zone or different utility's service area. We need one market for solar credits in the state, not separate fiefdoms. DOER needs to allow shared solar projects to share solar bill credits with any utility customer in the state, across load zones and utility service territories.

Rooftop solar. Not enough has been done to prioritize rooftop solar energy in low income communities where population is often dense and rooftops are the main space available for solar.

Expand the SMART program to 4800 MW to create a stable, healthy solar industry that creates and sustains jobs.

More than half of the 8,200 people employed in solar in Massachusetts at the beginning of the year have lost their jobs.

DOER should increase the size of the program to 4800 MW or more. The SMART program should be creating the solar pathway necessary for the Commonwealth to achieve at least an 80% reduction in emissions by 2050. A critical element of this is a stable program of at least 4800 MW that allows developers the certainty they need to pursue the multi-year lead times associated with financing, permitting, build-out, interconnection, hiring and job skills development.

Final Note. Solar will be a critical part of meeting our clean energy ambitions. All elements of our society must be able to participate in solar energy provided by a robust solar industry. Thank you for your work to make this possible.

Sincerely,

Judith Stetson
261 Quissett Ave.
Falmouth, MA 02543
juds3@comcast.net
(774) 563-4819

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