

SMART Public Comment

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

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To the DoER,

The following are my comments to DOER on SMART 4-15 Regulations

Robert Cherdack,

Ashfield MA,

Conservation Chair AMC Berkshire Chapter.

The DoER along with many private citizens and environmental organizations recognized that the original regulations were deeply flawed, resulting in deforestation of thousands of acres and failure to accomplish goals related to aiding communities. The revised regulations address some deficiencies but still have major flaws and roughly **double** the area to be consumed by solar installations while allowing much of the original 1600 MW of projects to be pursued under the old provisions. These new regulations were issued as emergency regulations but there is no emergency except to prevent solar developments in inappropriate locations as allowed under the old rules. However, the new regulations allow these developments to be grandfathered if they can get interconnections signed within the next 5 months.

The SMART program is a patchwork approach that leaves too many decisions in the hands of those interested in maximum profits and minimum hassle. If solar is to replace current fossil and nuclear generation, to a substantial degree, and provide additional energy for heating and transportation, well over 100,000 acres will be covered with panels and on the order of \$100 billion will be expended.

This should not occur in a helter skelter pattern created by entrepreneurs. The state should develop a well thought out plan that would address environmental impacts, consider the development of a hydrogen economy including imports from regions with more favorable climates and geographies for solar, and of course take into account off shore wind power. Questions as to where, how much, what type, should be decided based on what is likely to have the least economic, societal, and environmental cost and afford the maximum benefit to the state.

The following are comments on specific deficiencies in the revised SMART regulations.

1. **Merging Eversource blocks.** Paragraph 20.05 3 (e) calls for combining the capacity blocks for the eastern (formerly NSTAR) and western (Formerly WMECO) segments of Eversource. The block sizes reflect the demand the distribution companies serve. Combining the blocks will allow developers to build more capacity in the western part of the state 100 miles or more from the loads served by the eastern portion of Eversource. This will add to system losses, increase transmission system burdens, lead to more development in rural areas, all of which undermine the purported benefits of the program. While the eastern and western divisions of Eversource may be joined at the upper management levels when it comes to the physical distribution systems they are distinct entities. This is made evident by the eastern and western segments having different compensation rates. To put it another way, it makes no sense to allow more power to be added to western Eversource distribution system because of loads in the east served by the same corporation but using a different distribution system 100 miles away.

2. **Siting issues.** Category 1 units can be sited in areas containing preserved lands or important habitat etc. This makes sense as long as category 1 units are directly associated with farming or are on structures, brownfield, canopies over paved areas and similar locations. However, paragraph 20.05 (5) e 7 allow siting of 500kW to 5 MW solar generating units on land that should be off limits to development if the units qualify as a loosely defined public entity unit. This should be corrected. **Solar development on important habitat, landscapes and preserved space should be prevented regardless of who owns the unit.**

3. **Adders as Incentives, Subtractors as deterrents, and Carveouts.** The best way to achieve the purposes of the SMART program is with solar generation located at or near major loads and particularly behind the meter units. These are the locations that will reduce congestion, reduce peak loads on distribution and transmission systems, reduce system losses, and provide economic benefits to local populations and businesses. Incentives for units at these locations should be increased to overcome the added expense and complications involved with solar unit developments at these locations. Even more effective would be **carveouts large enough to ensure the majority of SMART** projects are developed in these optimum locations.

The rules reduce the tariffs for category 2 and 3 locations but not nearly enough to channel development away from greenfields. They should be increased to at least double the April 15 proposal. The rules also relate the tariff reductions to the area covered by panels; the reductions should depend on total area disturbed by the development of the unit, especially since we have seen that the acreage disturbed can be very substantially greater than that covered by the solar panels. Without much greater disincentives for units in greenfields and forests or much greater carveouts for placing capacity at developed sites, the new SMART regulations will still result in more thousands of acres of deforestation.

If increased carveouts are not implemented, DoER must do some real research and modeling rather than guessing as to how large adders and subtractors need to be to channel solar developments where they will do the most good.