

June 1, 2020

Commissioner Patrick Woodcock
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
Attn: Kaitlin Kelly
By email at DOER.SMART@mass.gov

Re: Comments on 400 MW Review

Dear Commissioner Woodcock:

I write to comment on the Land Use siting restrictions added to the SMART program under MassDOER's 400MW Review. I would like to respond to the vilification of those advocating for solar installations to be done on the built environment – large buildings, parking lots, landfills, etc. – before we target more open space – clearing forests & wetlands and destroying rare species and core & critical habitats – that I heard on the online public hearing of May 22nd. I had heard similar commentary when I attended DOER's presentation at Fitchburg State back in September.

If the incentives don't work for installing solar on already disturbed or compromised areas **then fix the incentives**. Don't allow the land rush we have seen here in central and western MA to continue or intensify. Multiple commenters last Friday spoke to their own situations so I will follow suit.

In 2016, I participated in my community's Solarize program to install a small 2.28kW system on the south quarter of my hip roof. That system was installed under the SREC II program. In 2019, I added another 3.52kW system (as I moved from wood heating to air sourced heat pump). That system, mainly on the east quarter of my roof rather than clearing for ground mount, was installed under the SMART program. At the time, the installer had warned me that the SMART program reduced incentives to 1/5th of my previous system.

The SRECs of my first system have sold for between \$269 and \$332.50 for each MW produced, the last selling in January at \$315 for a \$292.95 payout:

Statement Details

Product	Quantity	Unit Price	Net Value
MA2019-SREC-II	1	\$315.00	\$315.00
Total Sale			\$315.00
Fees			(\$22.05)
Total Due			\$292.95

The SMART "incentive" for my new system is 0.0597 per kW - FIVE POINT NINE CENTS per kWh for \$59.70 for each MW produced:

Compensation Rate Component	Value (\$/kWh)
Base Compensation Rate	\$0.28387
Energy Storage Adder	\$0.00000
Value of Energy Rate	-\$0.22417
SMART Incentive Payment Rate:	\$0.05970

So let's be generous and round that \$59.70 to sixty bucks. \$60 incentive vs. roughly \$300 is exactly the TWENTY PERCENT the solar installer suggested.

So who exactly is making solar installs a financial challenge? Those advocating for keeping carbon sequestering trees and wetlands sequestering their carbon while buffering many of the impacts of climate change in addition to their values of air and water filtering, wildlife habitat and recreation? Or those who designed a program with incentives that pay only 20% of the previous program which somehow leaves the destruction of natural resources the only "financially viable option"? Perhaps the electric utilities are not allowed to pillage upwards of 80% of the SMART incentive for their "Value of Energy Rate" charge from commercial installs - that I don't know. But I do know there are better places to site solar than forests, wetlands, and rare species habitat – incentivize those.

The Secretary of Energy and Environmental Affairs, in which DOER is housed, is quoted in the Commonwealth Magazine as saying "*the state will attempt to reduce emissions as much as possible through the development of renewable, low-emission forms of energy; aggressive energy efficiency programs; and sequestration efforts, including the development of new forests and wetlands*"¹ while she was touting the state's efforts to meet emissions requirements of the Global Warming Solutions Act. Please explain how destroying forests and wetlands to install solar systems furthers the state's attempts to adhere to the Act and move to net zero by 2050? Please explain why we would undertake "the development of new forests and wetlands" to sequester carbon in one agency while issuing a solar program in another agency that makes destroying carbon sequestering mature forests the most favorable choice? Why not incentivize siting them where there are no longer trees and wetlands sequestering carbon?

I urge DOER to:

- retain the land use restrictions that have finally been put in place;
- not provide any exemptions, even for public projects, or suddenly retract the new land use restrictions;
- restore the 5X Greenfield Subtractor that was originally proposed and include the total project footprint;
- work to make siting on the built environment financially viable and the preferred locations for large scale commercial solar installs; and
- not merge Eversource East and West territories which would likely lead to additional pressure on open space in their West territory and further distance energy generation from consumption in their East.

And please listen to the voices pleading for equitable access to clean solar energy. We do not wish to be pitted against each other. We need a program that incentivizes what serves our Commonwealth, and our common wealth, to get us all to the clean renewable energy future we need.

Sincerely,
Cathy Kristofferson
Ashby, MA

cc: Secretary Kathleen Theoharides, Executive Office of Energy and Environmental Affairs
Kurt Gaertner, Director of Land Policy and Planning, Executive Office of Energy and Environmental Affairs
Eric Stelzer, Regional Energy Division Director, Department of Energy Resources
Senator Anne Gobe
Representative Sheila Harrington

¹ <https://commonwealthmagazine.org/energy/net-zero-target-called-most-aggressive-in-world/>