

## SMART Public Comment

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

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First, it has been a pleasure working with the team as part of the Massachusetts Smart program. Even during tumultuous times, we've been able to have questions addressed by individuals willing to help – whether with Clearesult or the DOER. We have many projects we will be bringing online in 2020 and are excited to be part of a program bringing clean energy to the commonwealth and it's residents.

### Interim Period after Permission to Operate / COD

One opportunity to enhance the process has been with the interim period following a project receiving permission to operate. For a recent project, it took 5 weeks following COD for the project to begin receiving payments, while the utility set up "GARF implementation date" and had the asset officially registered with ISO-NE. More concerning, we also have AOBC projects that are energized but being paid based on the Interim QF rate (less than \$0.02/kwh) for extended periods of time while a final Large Incentive Claim goes through multiple approvals.

An opportunity to address this, without introducing risk, would be to adjust the process for filing Large Incentive Claims and issuing Final Statement of Qualification. From our perspective, all of the data inputs requested on the Large Incentive Claim could be provided 1-2 months in advance of receiving COD. This would allow the program administrator, applicable utility and DOER to review the submission and address concerns ahead of a project being energized. Projects could be ready for QF or AOBC status immediately at COD, or perhaps after a very short period where project owner submits a form to confirm there are no changes since completing the Large Incentive Claim, or providing details if there were changes.

Addressing the process during this interim period will provide multiple benefits. First, it will provide the DOER, utilities, and program administrators all required information prior to a project reaching COD. Second, it will streamline the process and reduce the need for interim QF status, which involves administrative steps for parties both filing and reviewing. Finally, this will bring renewable energy to the residents of Massachusetts that have eagerly signed up to be part of the Community Solar program earlier, and ensure the financial incentives are in place for solar project managers to continue bringing Community Solar projects to Massachusetts.

Thank you for your consideration

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