

Comments on SMART 4/15/20 Regulations

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Additional Comments from

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The DoER must keep in mind that the funds that make SMART tariffs above the commercial rate possible are created at the expense of taxpayers and ratepayers. These are public funds and should be used to encourage solar development **only in the most desirable areas**. Despite the impression some industry spokes people try to create, the SMART land use restrictions **do not keep** solar from being developed in the restricted areas but only **prevent public funds from being used** to justify financing such development.

The claim that solar installations are not permanent is specious. If the solar installations are going to affect climate change in the future they need to remain in service essentially forever, with unit replacement as needed.

Similarly claims that tree loss is temporary and eventually forests will recover ignore the fact that the next 40 years of carbon absorption are critical and the fact that solar installation are permanent.