

Commissioner Patrick Woodcock
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
RE: SMART Public Comment

May 20, 2020

Dear Commissioner Woodcock,

Massachusetts' SMART program has successfully scaled up energy storage in Massachusetts over the past couple years. Fluence is one of the leading suppliers of energy storage technology through the SMART program, and we have been proud to see our systems deployed – increasing the value of renewable energy installed in Massachusetts, and reducing dependence on costly fossil fuel infrastructure.

While we are encouraged to see the state's commitment to building on the success of the SMART program, we have significant concerns about the recent Emergency Regulations' proposed modifications to land usage rules, which were not previously vetted through a stakeholder process. Specifically, that the rules, when combined with other barriers to development, essentially prohibit new large scale ground-mounted solar projects. Nearly 90% of energy storage capacity installed through the SMART program has been paired with large ground-mounted solar projects. If enacted, these changes would severely inhibit the ability to grow energy storage in the state of Massachusetts in a cost effective manner, and would hinder Massachusetts' ability to achieve its clean energy and storage goals.

With this in mind, we urge the DOER to remove the new land use prohibitions, which effectively remove an additional 40% of the state's land mass from consideration. At a minimum, we urge the DOER to allow earlier-stage projects currently in development to be exempted.

Massachusetts' SMART has been a storage program nearly as much as it has been a solar program, and we want it to remain strong.

Sincerely,



Ray Hohenstein
Market Applications Director