



HEARTWOOD GROUP, INC.

165 Evergreen Street, Providence, RI 02906

401-861-1650

June 1, 2020

Patrick Woodcock, Commissioner
Massachusetts Department of Energy Resources
Via E-mail

Commissioner Woodcock and all,

Thank you for the opportunity to submit comments regarding the Solar Massachusetts Renewable Target ("SMART") Program Emergency Regulations.

I have a couple key areas to address:

1) Interconnection Delays: Extensions to SMART qualifications should be granted automatically by right for projects experiencing long interconnection delays from the distribution utilities. Numerous projects have been in development for several years and got caught up in utility area and cluster studies involving long delays. Specifically any project that had documented site control and all necessary local permits in place prior to the publication of the emergency regulations should be allowed to preserve their SMART allocation for as long as it takes for the utilities to complete necessary upgrades to their distribution system.

As an example, we have a project that had its necessary local permits in place my mid-January 2018. We applied for interconnection in mid-December 2017. We then got caught up in the cluster studies, area studies and ASO studies. Now we are being told it will be several years before a new substation can be built to accommodate the project. Like many other project developers, we have invested a couple hundred thousand dollars in the project before ever hearing of even a possibility of all these studies, delays and added costs. Until the utility system is ready to interconnect, developers should be allowed to maintain their SMART qualification when, through no fault of their own, they are impacted by such major changes in the utility interconnection process. Solar projects shouldn't be penalized as these delays are clearly outside the control of the applicants.

2) Agricultural Adders: Agricultural adders should be more flexible in their requirements. I have another project in Rhode island that is installing equipment on normal racking at normal heights and being developed to support both sheep and bees in a meadow habitat. Though the seeding and maintenance of the cover crop is more challenging and expensive than just planting grass, there is no need to sacrifice solar production by spacing the panels or create unsightly raised system and adding unnecessary structural costs. In fact the shading from the panels has been shown to be beneficial for sheep. The one solution for all crops that are currently in the agricultural guidelines is an inappropriate way to support dual use projects.

3) Complexity: Between the original regulations, the emergency regulations, the guidelines, the DPU process impacting cost allocation for interconnection and other moving targets in the regulatory environment, solar in the age of the SMART Program is really complicated. The market for solar would benefit greatly by simplifying and clarifying the rules of the game as much as possible.

Thank you very much for your consideration of these thoughts.

Sincerely

A handwritten signature in blue ink, appearing to read 'Fred Unger', is written over a faint, light blue circular watermark or seal.

Fred Unger
President, Heartwood Group, Inc.