



June 29, 2020

The Honorable Patrick C. Woodcock
Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: SMART Program (225 CMR 20.00) Revised Guidelines

Commissioner Woodcock,

Colonial Power Group, Inc. ("Colonial") appreciates the opportunity to comment in complete support of the revised SMART guidelines recently issued by the Massachusetts Department of Energy Resources ("DOER"). As a result of DOER's emergency regulations and revised guidelines, the key elements of the SMART program are significantly improved to allow the allocation of benefits to low income customers, and therefore remedy a shared frustration of the DOER and solar industry stakeholders regarding minimal low-income customer participation.

ABOUT COLONIAL POWER

Colonial provides energy advisory and procurement services to communities developing and maintaining municipal aggregation programs. Since its formation in 2002, Colonial has served as a municipal aggregator to more than 80 programs in Massachusetts. As a result of the DOER's recent actions expanding the SMART program, Colonial has the opportunity to serve low-income customers with discounted electricity significantly below the costs of existing aggregation programs.

COMMENTS

In its emergency regulations and revised guidelines, the DOER has introduced eligibility criteria, processes and procedures for solar tariff generation units to qualify as Low-Income Community Shared Solar Tariff Generation Units by allocating rate discounts or credits through municipal load aggregation programs ("LICSS MAP"). Colonial applauds the DOER's foresight to recognize the potential offered through municipal aggregation to facilitate the participation of low-income consumers in SMART. The DOER has advanced its program platform by striking an excellent balance between program requirements and flexibility.

1. DOER has created a sound framework that allows stakeholders the flexibility to create unique solutions to meet SMART objectives and requirements.

The DOER added important new requirements designed to ensure that low-income customers ultimately participate in and benefit from the SMART program. As a result of DOER's modified regulations and guidelines, low-income customers will benefit from net savings on their electric usage and receive accurate information regarding their participation. At the same time, the DOER recognized the need to allow the solar developers and aggregators to implement the structural elements of the program in a way that affirms SMART program objectives are adhered to contractual and administrative details while enabling economic viability for the stakeholders. For example, Colonial supports new guidelines that effectively encourage companies to work pro-actively with the DOER to seek and obtain pre-determination approvals. By not overly expanding specific requirements for the retention of the low-income community shared solar compensation rate adder, the DOER's approach gives room for aggregators and solar providers to work creatively toward constructing mutually agreeable contractual arrangements. It is reasonable to expect different, but equally acceptable, approaches across municipal aggregation plans, municipal aggregators, and solar companies.

Further, details that work effectively at the start may require modification as the SMART program matures. Colonial anticipates that such flexibility will help facilitate a broad participation from the solar industry utilizing a variety of financing and development models. In turn, such flexibility will result in a wider and more robust distribution of economic benefits to low-income customers.

2. DOER's revised requirements for disclosure forms will help ensure that the LICSS MAP is a success.

DOER rightfully recognized that one aspect of ensuring success of the low-income aggregation program is to build upon existing notification procedures and customer disclosure requirements without weakening the program with overly prescriptive requirements that, if not accurately aligned with individualized arrangements, run the risk of ineffectiveness or creating customer confusion. By ensuring that the customer of record is the municipality and requiring aggregators to maintain detailed records about the individual low-income customers being served, their electricity usage, and the costs they pay for that electricity, DOER has set the parameters for success of its low-income aggregation program.

CONCLUSION

For the reasons detailed above, Colonial fully supports the modifications that DOER has made to the SMART program to open up its LICSS MAP. All of us at Colonial look forward to continued collaboration with the DOER to further our shared goals of successful solar development that allows low-income customers to share in the benefits that such development creates.

Respectfully submitted,

COLONIAL POWER GROUP, INC.

By,

A handwritten signature in black ink, appearing to read "Stuart Ormsbee", written over a horizontal line.

Stuart Ormsbee

Vice President, Power Supply Strategies