



Jared Alvord, Co-Founder
Mad River Solar, LLC
PO Box 966
Waitsfield, VT 05673
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MA SMART Program Team
DOER.SMART@mass.gov

Dear MA SMART Program Team,

Thank you for the opportunity to comment on the SMART Guidelines and SMART Emergency Regulations. My company, Mad River Solar, LLC, is a stakeholder in the program that will be severely impacted by the current parameters of the straw proposal.

Mad River Solar, LLC has been actively developing a solar plus ESS project (NBE Fitchburg Solar – 4.3947 MW AC) in Fitchburg, Massachusetts for the past twenty months. We, along with our partner North Branch Energy, LLC (property owner) have spent substantial development capital on wetland delineations, environmental studies, geotechnical studies, engineering, municipal permitting, and interconnection fees to date. We submitted our project into MA SMART on August 15th, 2019 and received our waitlist confirmation on August 27th, 2019. You can understand our frustration when we saw the MA SMART Emergency Regulations Guideline on Capacity Blocks, Base Compensation Rates, and Compensation Rate Adders which for Until were only made available this week. The 7.7% block by block base rate step down, as well as the lower block capacity availability for projects over 1 MW AC, severely effects our projects viability to the point that our project is unfinanceable. With our project being one of the only large projects in the Until queue, as well as having been on the MA SMART waitlist for ten months, this has a severe impact on solar in Until.

I am writing now to ask that you consider decreasing the block by block step down for large projects over 1 MW AC from 7.7% to 2%. This is in line with the public comments in other utility load zones. Until began MA SMART with the lowest base rate of any utility. Adding in these extreme block % decreases make projects unfinanceable in Until territory moving forward. If nothing is done to update the current proposal, this decision will have severe economic hardship on our company.

I hope that you will consider these comments and allow us to bring this solar project to completion for all our stakeholder's benefit.

Sincerely,

Jared Alvord, Co-Founder
Mad River Solar, LLC