

Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: SMART Consumer Protection Guidelines, SMART Alternative CSS Guidelines

I. Introduction

Ampion is a third-party service provider for Community Shared Solar (“CSS”) developers in the Commonwealth. Ampion provides customer acquisition, billing and payment, customer care, and portfolio management services to facilitate the deployment and management of CSS projects.

Ampion has supported CSS assets in the Commonwealth since 2014. As of the time of this filing, Ampion supports some of the only operational (understood here to mean producing credits) SMART CSS assets. Moreover, Ampion’s clientele represent a diverse mix of industry participants with varying financial structures, which uniquely positions Ampion to represent multiple distinct viewpoints as part of our comments. Ampion hereby makes the following comments in an effort to streamline existing, but nascent, elements of CSS administration.

II. Comments on Consumer Protection Guidelines

Proposed redlines to 225 C.M.R. 20.00 include language clarifying that “no individual or distinct legal entity will receive bill credits or electricity in an amount that exceeds the applicable limitations noted in 20.06(1)(f)1, even if the credits are allocated across multiple utility accounts.” Ampion requests that DOER add language to the new Guideline on SMART Consumer Protection to further clarify that DOER determines a “legal entity” based on the state tax identification number, so as to provide complete clarity for CSS developers in their acquisition and compliance efforts.

Where possible, Ampion also seeks additional clarity on the annual compliance filing requirements (i.e., those that take place separate from audits) for CSS assets. Items that Ampion seeks clarity on include the following:

- Whether and how to enumerate added/dropped subscribers;
- Whether and how to enumerate customers who receive allocations associated with more than 25 kW of AC nameplate capacity;
- Whether any additional documentation will be required beyond an updated packet of disclosure forms.

Finally, Ampion requests additional guidance on whether or not Disclosure Forms must be furnished for subscribers who receive allocations associated with less than 25 kW of nameplate capacity for the specified asset, but who receive allocation(s) associated with more than 25 kW of AC nameplate capacity from other CSS assets. If this holistic view also allows for exemption, Ampion requests guidance on how to furnish sufficient proof that the subscriber receives such allocations from other assets.

III. Comments on Alternative Programs for Community Shared Solar and Low-Income Community Shared Solar Generation Units

Ampion appreciates the consideration DOER has afforded to this topic to date, and the ingenuity involved in this new business model for CSS developers and CCAs alike. would like to formally request that DOER initiate a series of collaborative working groups with interested stakeholders regarding this topic.

IV. Conclusion

Ampion thanks DOER for the ability to submit these comments and for their continued work on improving the SMART program.

Sincerely,

Emily Cosbar

Market Market Policy Analyst

Ampion

31 St James Ave, Suite 355

Boston, MA 02116