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June 29, 2020

Via E-Mail

[DOER.SMART@mass.gov](mailto:DOER.SMART@mass.gov)

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

Re: SMART Public Comments of the Massachusetts Electric Distribution Companies

Dear Ms. Kelly:

On behalf of NSTAR Electric Company d/b/a Eversource Energy ("Eversource"), enclosed are written comments concerning the Department of Energy Resource's revised Solar Massachusetts Renewable Target ("SMART") Program guidelines.

Thank you for your attention to this matter. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew S. Stern".

Matthew S. Stern, Esq.

Enclosures

**SMART PUBLIC COMMENTS OF**  
**NSTAR ELECTRIC COMPANY d/b/a EVERSOURCE ENERGY**

**I. INTRODUCTION**

On April 14, 2020, the Massachusetts Department of Energy Resources (“DOER”) filed revised Solar Massachusetts Renewable Target (“SMART”) Program regulations, 225 C.M.R. § 20.00 et seq. with the Secretary of the Commonwealth as emergency regulations. DOER established a deadline of June 1, 2020 for public comment on the revised regulations. In addition, DOER issued a first set of guidelines, with a public comment deadline of June 1, 2020: Statement of Qualification Reservation Period Guideline; Guideline on Capacity Blocks, Base Compensation Rates, and Compensation Rate Adders; and Guideline Regarding Land Use, Siting, and Project Segmentation.

Subsequently, DOER issued additional guidelines with a public comment deadline of June 18, 2020, which was later extended to June 29, 2020: Guideline Regarding the Definition of “Brownfield”; Guideline on Establishing SMART Compensation Rates; Guideline on Energy Storage; Guideline Regarding Low Income Generation Units; Guideline on SMART Consumer Protection; Guideline Regarding Metering of Solar and Energy Storage Systems; and Guideline Regarding Alternative Programs for Community Shared Solar Tariff Generation Units and Low Income Community Shared Solar Tariff Generation Units.

Pursuant to the above-noted comment periods, NSTAR Electric Company d/b/a Eversource Energy (“Eversource”) provides the following comments on the guidelines.

**II. COMMENTS ON INDIVIDUAL GUIDELINES**

**A. Guideline Regarding Metering of Solar and Energy Storage Systems.**

The Guideline Regarding Metering of Solar and Energy Storage Systems could be interpreted to permit the use of customer-owned metering equipment as of May 18, 2020. This

interpretation directly contradicts the Department of Public Utilities (“DPU”) order in D.P.U. 17-140 on SMART program meter ownership and creates uncertainty around one of the fundamental aspects of the SMART program. Further, the questions of meter ownership for solar projects paired with storage were originally prompted by system design limitations that have since been resolved and numerous projects have successfully been installed and metered under the SMART program.

As written, the guideline applies to all solar project paired with storage under the SMART program. This would allow customers with standalone systems to use inverter-based metering as a substitute for the EDC-owned revenue meter for a project. This sweeping change to fundamental EDC metering strategies and DPU order requiring EDC ownership of meters has significant and currently unknown implications for EDC billing systems and load settlement procedures.

Were customer ownership of metering allowed, the guidelines would be insufficient to serve as a program implementation guide. For instance, substantive issues related to customer obligations and requirements are not addressed, nor are issues related to meter data access, data verification, or bill cycle reading dates. Any obligations placed on customers to report program data under a tariff would need to include appropriate enforcement mechanisms that fairly and clearly provide EDCs with the ability to bring non-complying customers into compliance.

#### **B. Guideline on Establishing SMART Compensation Rates.**

Recent billing procedure modifications now allow Eversource to individually meter and compensate multiple standalone STGUs behind a single net revenue/retail meter and delivery point, provided each STGU is covered by its own Interconnection Service Agreement. Going forwards, applicants can work with the Eversource interconnections department to determine the

optimal construction approach technically and economically for connecting multiple STGUs to Eversource's system (e.g., one or multiple interconnection points).

**C. Guideline on Capacity Blocks, Base Compensation Rates, and Compensation Rate Adders.**

Eversource respectfully notes that there appears to be a calculation error in cell R17 on the Capacity Block Sizes tab of this guideline.

**D. Guideline on Energy Storage.**

The answers to FAQ question (f) may benefit from clarification as to how the operational requirements in items 1) and 2) relate to the further guidance provided related to Standalone and Behind the Meter systems. It is unclear if and how these requirements are interrelated.

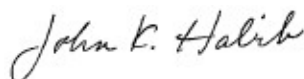
**III. CONCLUSION**

Eversource appreciates the opportunity to submit comments on the revised SMART guidelines and look forward to continued collaboration with the DOER and stakeholders to implement the expanded program.

**Respectfully submitted,**

**NSTAR ELECTRIC COMPANY d/b/a  
EVERSOURCE ENERGY**

By its attorneys,



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Dated: June 29, 2020