



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

June 29th, 2020

Dear Department of Energy Resources,

The Green Justice Coalition thanks you for recent efforts to begin to include low income projects in Massachusetts' solar programs. We were delighted to hear that a set-aside was adopted and that consumer protections were included among other policies that will directly increase benefits for frontline communities.

Unfortunately, we have some concerns about the program moving forward and the Low-income Guidelines reinforce a lack of transparency, accountability, and community control that is a core feature of the Commonwealth's energy programs across the board. Our worries relevant to this comment process come from utility involvement in the generation of electricity, the lack of data and transparency, and the continuation of a system that is impractical for solar developers and low-income offtakers.

Investor-owned utility (IOU) companies should not be directly involved in low income solar programs outside of helping administer the bill credits. This is for multiple reasons, including possibilities of double-dealing and anti-competitive practices, especially if this regulation leads to higher revenue requirements for the utility companies. Utility companies and the Department of Public Utilities also have an extensive track record of excluding environmental justice communities from their decision making processes. We are wary of giving IOUs ill-defined authority to participate in emergent market spaces that are meant to benefit environmental justice communities, especially without some sort of monetary disincentive to guarantee public benefit. There is also the implication in these guidelines that only IOUs will be allowed to structure solar offerings in alternative ways, and this option should be extended to developers that are operating in good faith to provide low-income solar with safeguards for low-income offtakers.



This leads to our second point, which is that these guidelines and the regulations do not address the lack of information to which decision-makers, stakeholders, and the public have access. Transparency is necessary to ensure accountability which has been a key stumbling block to low income energy program access throughout the energy system. Without more accessible data on how big the solar program is and where limited rate-based money is going, how are we to assess the program? We need data on the low income projects, what types they are, how much oftakers are benefiting, and specifically which communities are benefiting from this public program, ideally at a resolution size similar to zip code level rather than municipal or larger.

The SMART program is not only complicated but also overly burdensome for low-income developers and environmental justice communities. There have been many proposals to increase mutual benefits without raising program costs significantly and the department has not moved on the fundamental non-market barriers that make it much easier to finance a simple utility-scale ground mount system than a complicated community shared solar system with many oftakers to manage. We cannot expect better results from a system that at every step tells every stakeholder that it will be harder, slower, and less worth it to provide energy to low income people. This means that disproportionately our public resources are not reaching black, indigenous, latinx, disabled, renter, non-English speaking, immigrant, and urban communities. We do not even have the ability to tell you exactly how disproportionate because program data is not available and the department does not prioritize equity analysis in its practices.

Thank you for the opportunity to comment and hopefully we can see increased benefits start flowing as soon as possible.

Sincerely,
Green Justice Coalition