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Abby Barnicle
Renewable Energy Program Coordinator
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston MA, 02114

Re: Comments on SMART Guideline Regarding Alternative Programs for Community Shared Solar Tariff Generation Units and Low Income Community Shared Solar Tariff Generation Units

Dear Abby,

Ameresco hereby submits comments on the SMART Guideline Regarding Alternative Programs for Community Shared Solar Tariff Generation Units and Low Income Community Shared Solar (LICSS) Tariff Generation Units. Ameresco is a renewable energy developer based in Framingham, MA with over 441 MW of solar projects completed and in construction across North America, and nearly 100 MW of projects operating in Massachusetts. We develop solar projects with a range of customers including commercial, utilities, Federal, State and local governments, as well as community solar projects that benefit low income customers. We are interested in commenting on the LICSS guidelines in effort to better address the challenges of low to moderate income (LMI) offtake and access in these programs.

We applaud the efforts of the Department of Energy Resources (DOER) to improve the SMART program rules to address barriers to providing clean energy access to low income communities. We appreciate that the DOER is exploring innovative solutions by providing multiple opportunities through the SMART Program to reduce electricity costs through solar projects to low income customers through the LICSS options including through Municipal Aggregation and EDC Procurements. This flexibility and offerings will help reduce financial risks for developers so that we can offer greater savings to low income customers.

We are however concerned that the redlines of the Guidelines for LICSS will place additional barriers to the LICSS Municipal Aggregator option, which will negatively impact low income customers directly. Several sections in the Guidelines appear to place new approval processes and reviews on municipal aggregation including: Sections 2(b), 2(c) ii, 2(d), 3(b). These proposed changes ultimately affect low income customers by delaying timelines for solar developers that had planned to develop LICSS projects through Municipal Aggregation, and

therefore further delaying the ability of these developers to offer the benefits of SMART projects to low income customers. These changes may also result in less developers pursuing LICSS projects: for developers like Ameresco that wish to participate in the LICSS program and already have projects in development that could provide direct benefits to low income customers now, further delays of the LICSS Municipal Aggregator category will force developers that face timeline constraints to pursue alternative offtake to meet SMART timelines and development timelines, which of course hurts low income customers that need these benefits most urgently.

We understand that these programs need to go through appropriate approvals, but while DOER is aiming to improve the LICSS program in SMART to address gaps in reaching low income customers, we are concerned that the additional requirements outlined in the revised LICSS Guideline draft will cause further delays to achieving DOER's goals of improving access to low income communities. In line with the revised Guidelines, we also request further clarification on the requirements outlined in Sections 2(b), 2(c)ii, 2(d), 3(b), so that all parties can better understand the steps needed to receive approvals and can move forward with the development of LICSS projects.

In closing, we urge DOER to ensure that both options for LICSS are available in the near-term to developers—both through Municipal Aggregation and EDC Procurements – and that there are not unwarranted restrictions placed on LICSS through Municipal Aggregation, so that the benefits of the SMART program can be realized by low income customers and Municipalities participating in this program.

We appreciate the DOER's consideration of these comments. Please don't hesitate to contact us for further information or clarification on these issues.

Sincerely,



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