



March 5, 2021

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

Re: Borrego Comments on Draft Updates to SMART Guidelines

Dear Commissioner Woodcock,

Borrego Solar Systems, Inc. (Borrego) appreciates the opportunity to provide comments on the draft updates to the SMART Program Guidelines. Borrego is in agreement with the comments submitted by the Northeast Clean Energy Council (NECEC), the Coalition for Community Solar Access (CCSA), and the Solar Energy Industries Association (SEIA), and supports their request for an additional 6 month blanket SOQ extension in light of COVID-19.

Borrego supports the changes proposed in the Energy Storage Guideline that would ensure that AC- and DC-coupled systems are compensated equally. We also support and appreciate the change regarding compliance with operational requirements for energy storage systems, which will ensure that energy storage systems are not penalized simply for coming online later in the year. In addition to expressing our support for these changes to the Energy Storage Guideline, we are also writing to submit an additional recommendation for adjusting the Statement of Qualification Guideline as detailed below.

**Statement of Qualification Order for Projects in Group Study**

Recent efforts by the DOER and DPU to streamline the interconnection process for distributed generation has led to large numbers of projects in group studies. When multiple projects are involved in group studies, they receive their Interconnection Service Agreement (ISA) at the same time and thus apply for their SMART Statement of Qualification at the same time. The current SOQ Guideline states that applications received at the same time will be ordered by ISA date, and if they have the same ISA date, "according to a random selection performed by either the Department or the Solar Program Administrator" (section 3.b.ii-iii).

However, given the large number of projects involved in ongoing group studies, there are several issues that could result from this process. Given that SMART is a declining block program, developers are motivated to apply for an SOQ as soon as their project is eligible in order to secure the highest block possible. When large numbers of projects in a group study receive their ISAs at the same time, there is likely to be a run on the application process, which could cause administrative issues for DOER. In addition, a given project's block

position might be determined by trivial factors like internet connection speed, which could lead to disputes and further administrative burdens.

In prioritizing SOQ applications by ISA date, the intent of the regulation is to assign higher block positions to the most mature projects, to effect a timely deployment of clean energy. However, group studies are often made up of projects that have been waiting in the interconnection queue for periods that can stretch to years, along with other projects that have only recently submitted their interconnection application--yet they all receive the same ISA date when the group study concludes. Ordering by random selection does not serve the intent of the regulation, and will likely result in some early-stage projects being prioritized over shovel-ready projects.

DOER has already recognized that these are undesirable outcomes: the SOQ Guideline currently includes a provision to prevent a similar set of circumstances as a result of groups of projects coming out of Affected System Operator (ASO) studies and receiving ISAs at the same time. In order to address this issue for all group studies, we suggest a simple change to expand section 10 of the SOQ Guideline to address group studies at the distribution level in addition to Affected System Operator studies:

10) Application Review Following the Completion of a ~~a~~ Group Study or Affected System Operator Study

*If a distribution company completes a ~~a~~ Group Study or Affected System Operator study, and the distribution company has issued multiple ISAs, the Department may inform Applicants that it will pause application processing within that distribution company's open Capacity Blocks for a five day period. During that time, all applications will be considered to have been submitted at the same time. Applications will be ranked first by the date that the distribution company provided an executable ISA ~~date to the Applicant~~, then by the date of the ISA application.*

The 5-day pause on application processing successfully addresses the potential for administrative burdens caused by a run on applications, and ordering by ISA application date is a fair and reasonable measure of project maturity when projects have the same ISA date. In addition, we suggest clarifying that "ISA date" refers to the date that an executable ISA was provided by the distribution company, rather than the date the ISA was fully executed. This will avoid any inequities that could be caused by different processing timelines for the distribution companies to countersign ISAs.

The small but important edits to the SOQ Guideline suggested above would ensure that the increasing numbers of projects involved in group study are treated fairly, and that DOER avoids the administrative burden that would come along with a rush on SOQ applications. Thank you for considering our feedback on the draft updates to the SMART Program

Guidelines; we appreciate the opportunity to offer our input and look forward to continued dialogue.

Sincerely,

Jessica Robertson  
Director of Policy and Business Development, New England  
Borrego Solar Systems, Inc.