



March 5, 2021

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

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

Dear Commissioner Woodcock:

BlueWave Solar appreciates the Department of Energy Resources' (DOER) ongoing commitment to refining and improving the SMART program. We especially thank you for your attention and engagement surrounding the participation of low income residents in community solar projects across the Commonwealth. BlueWave looks forward to continued discussion about how to best serve this population during the intersecting crises of COVID-19 and climate change. To this end, we offer the following comments on DOER's updated guideline regarding Alternative Programs for Community Shared Solar Tariff Generation Units (CSS) and Low Income Community Shared Solar Tariff Generation Units (LICSS).

BlueWave is a community solar developer and services provider, which co-developed the first community solar projects in Massachusetts and continues to innovate for the benefit of our customers, landowners, and communities. We have developed over 135 MW of community and public solar. BlueWave currently delivers customer acquisition and management services for over 425MW of community solar, providing access to thousands of customers throughout Massachusetts, New York, and Minnesota.

DOER's updated guideline is a step towards enabling alternative programs to serve community solar customers of all incomes. We remain concerned, however, by the delays in both DOER and the Department of Public Utilities' (DPU) processes towards achievement of our common goal. Specifying that alternative CSS/LICSS programs partnering with a municipal load aggregation plan must gain DPU approval for all updates to the plan is a necessary clarification, however, it does not assure stakeholders that these plans will be approved in a timely manner.

Expedited approval of both new municipal load aggregation plans, as well as updates to existing plans that enable CSS/LICSS access, are critical to serving this segment of Massachusetts residents. BlueWave and others who are innovating to expand community solar access have already waited many months for the SMART expansion and related tariffs to be approved, which would enable continued growth and investment. We cannot absorb further delays in the review and approval of municipal load aggregation plans; doing so would prevent us from implementing solutions and beginning to serve customers. Even more urgent is the need to reduce these customers' energy burdens as economic uncertainties increase and the COVID-19 crisis deepens.

In addition, projects that have already received their SMART approvals are beginning to approach project operation deadlines. While BlueWave would like to utilize projects in this situation to serve low-income customers, extended timelines (to the tune of six or seven months) for review and approval from DOER and DPU will prevent us from doing so. Because the alternative programs for CSS/LICSS are a new approach, investors are looking for certainty that DOER and DPU have already given municipal load aggregation plans the green light before commencing construction. Projects without such approval will have to forego the alternative program approach. In order to ensure the maximum number of projects

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participating in alternative programs to increase CSS/LICSS access, we urge DOER and DPU to act swiftly at every opportunity to get these programs up and running.

Finally, BlueWave has identified one area for clarification within the updated guideline itself. Section 2 (c) states that “the applicant must provide the following off-taker information to the Department...i.v. Demonstration that a customer is not participating in more than one alternative CSS/LICSS program.” It remains unclear how an applicant would demonstrate this information, much less have direct access to it. BlueWave proposes that responsibility for making this demonstration should be with the utility, rather than the applicant, as the utility would have access to information on each customer’s participation in alternative CSS/LICSS programs.

However, we believe that this requirement is overly restrictive and may allow for less flexibility in designing alternative programs to serve CSS/LICSS customers. BlueWave appreciates DOER’s commitment to allowing creativity and innovation within this space thus far. To that end, we believe the requirement as currently written may result in creating even more barriers than presenting a solution to a specific problem. BlueWave invites further discussion with DOER to understand the intention of this language and possibly recommend further tweaks to clarify its impact. We look forward to having this conversation and appreciate DOER’s continued collaboration.

Thank you for your attention to and consideration of our strategies for expanding community solar access in the Commonwealth. In this updated guideline, DOER has outlined important next steps for getting alternative CSS/LICSS programs up and running. BlueWave looks forward to continued engagement with DOER and others in this space towards our collective benefit of serving more customers and contributing to our clean energy future. Above all, it is imperative that we act with the urgency our economy and environment demand. Please let us know if you have any questions.

Sincerely,

Mark Sylvia  
Chief of Staff  
BlueWave Solar