

**From:** Patrick Roche <[patrick@goodenergy.com](mailto:patrick@goodenergy.com)>  
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**To:** DOER SMART (ENE) <[doer.smart@mass.gov](mailto:doer.smart@mass.gov)>  
**Subject:** SMART Guideline Comments

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These comments below are submitted on behalf of Good Energy, L.P. for the Guideline Regarding Alternative Programs for Community Shared Solar Tariff Generation Units and Low Income Community Shared Solar Tariff Generation Units.

2.c.ii and 3.c.ii now require "Demonstration that the energy or energy credits are allocated to each customer on a monthly basis based on STGU production". Since the production of the STGU will vary on a monthly basis, this would suggest that the energy or energy credits must also vary on a monthly basis. Good Energy has envisioned an option to provide a fixed per kWh discount to the end customer, and such a fixed discount now seems unallowable. A fixed per kWh discount to the end customer may be preferable, as it reduces administrative costs on both the aggregation and the utility billing system of changing discount amounts monthly (municipal aggregations utilize consolidated billing through the utilities). We urge DOER to consider allowing the fixed discount, recognizing that savings cannot be guaranteed.

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**Patrick Roche**

Director of Innovation, New England

Good Energy, L.P.

1 Beacon St, 15th Floor, Boston, MA 02108

P: 617-202-0797 M: 617-710-0615 | [patrick@goodenergy.com](mailto:patrick@goodenergy.com) | [www.goodenergy.com](http://www.goodenergy.com)