

Via Electronic Mail

March 5, 2021

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

Re: Draft SMART Guideline – February 2021, ConEdison Clean Energy Businesses Comments

Dear Ms. Barnicle,

ConEdison Clean Energy Businesses (ConEd CEB) appreciates the opportunity to submit these comments to the Department regarding the Draft SMART Guidelines issued on February 12, 2021. We are writing in support of the comments submitted by the Clean Energy Parties and by the Cape Light Compact (CLC).

ConEd CEB agrees with and supports the Clean Energy Parties' comments on RTE, the inclusion of an Incentive Payment Date provision with regard to the Cycling Requirement, including Group Studies in the ASO Study provision of the SOQ Reservation Period Guideline and a common-sense COVID-19 Extension Request.

Likewise, ConEd CEB supports CLC's comments, in particular with regard to their proposal to strike Section 2(d) of the redlined LICSS Guideline re: Municipal Load Aggregations, which would require municipal aggregators to amend and re-file their municipal aggregation plans (MAP) with the DPU prior to offering a LICSS program to their residents. CLC correctly points out that aggregations' MAPs already contain language which allow this, and that such a provision only erects barriers to aggregation customers realizing the benefits of an LICSS program.

ConEd CEB thanks the Department for its consideration of the Clean Energy Parties and CLC's recommendations. We look forward to continuing to work with DOER to accelerate the deployment of solar in the Commonwealth and ensuring that the benefits are available to all Massachusetts residents.

Regards,



Thomas Sweeney
Managing Director, Community Solar