

February 19, 2018

Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Department of Energy Resources
100 Cambridge St., Suite 1020
Boston, MA 02114
DOER.SMART@state.ma.us

RE: SMART Guideline Comments

To Whom It May Concern,

Associated Energy Developers (AED), a sustainable energy developer in Plymouth, MA, and the Conservation & Sustainability Interfaith Partnership (CSIP), a non-profit partnership between renewable energy, energy efficiency, and sustainability groups formed to promote sustainability within faith communities, hereby submit these comments to the Massachusetts Department of Energy Resources' (DOER) "Guideline Regarding Low Income Generation Units" pertaining to the Solar Massachusetts Renewable Target (SMART) Program (225 CMR 20.00).

The entities listed above jointly recommend that the DOER amend the definition of a "Low Income Property Solar Tariff Generation Unit" to include "Houses of Worship (Non-Profit)". These Houses of Worship may be defined as "places of worship, including but not limited to churches, mosques, and synagogues, and any properties and/or facilities owned and operated by such entity, that are federally tax-exempt under section 501(c)(3) of the Internal Revenue Code". Under this revised definition, Houses of Worship would be eligible to receive the Offtaker-based Low Income Property Solar Tariff Generation Unit Adder of \$0.03/kWh (in Adder Tranche I).

Our justification of this proposed amendment takes root in the reality that many Houses of Worship in the Commonwealth of Massachusetts experience difficulty in obtaining fair and equitable access to solar photovoltaic technologies for installation on their properties. Many of these faith-based entities rely on member donations and fundraising events to raise the funds necessary to pay their electric bills and could benefit greatly from both the savings on electricity and the income generated by a solar PV system. In many cases, the income of these organizations is seldom steady, and these funds are too often insufficient to cover the costs of a solar PV system. Additionally, since these Houses of Worship are tax-exempt, they are, as a result, unable to take advantage of lucrative tax credits that have played an instrumental role in allowing an innumerable amount of solar PV projects to be constructed. As such, these organizations are naturally at a disadvantage in obtaining access to solar PV ownership.

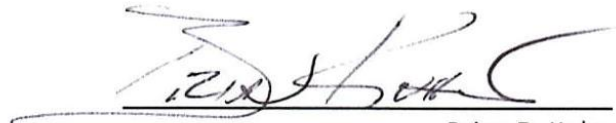
It is our belief that if these Houses of Worship were able to realize the benefits of a significant SMART adder such as the Low Income Property Solar Tariff Generation Unit Adder, it would lead to a great many number of solar projects installed on the property of and providing benefit to Houses of Worship. The submitters of these comments have significant experience working with Houses of Worship in the

Commonwealth and across the nation who have a deep interest in installing a solar PV system but do not have the financial means to. With the additional incentive that the Low Income Property Solar Tariff Generation Unit Adder would provide, Houses of Worship would be better able to benefit from the installation of solar PV projects on their properties.

Furthermore, there is a legal need for the DOER to assist Houses of Worship procure solar. Under Chapter 75 of the Acts of 2016 Section 11(b), whereas the Commonwealth set out "to provide forthwith for the continued support of solar power generation and a transition to a stable and equitable solar market", the DOER was obligated to promulgate rules and regulations implementing a solar incentive program which "differentiates incentive levels to support diverse installation types and sizes that provide unique benefits". Therefore, we contend, the DOER is statutorily obligated to ensure equitable access to the solar market among a diverse array of people and organizations across the Commonwealth. We believe that the DOER has not taken into consideration the needs of faith communities by not leveling the playing field in the Massachusetts solar market for Houses of Worship. These organizations face an unfair disadvantage in procuring solar PV, and only through effective policy can we as an industry and a society provide fair and equitable access to sustainable energy for all.

It is the joint wish of AED and CSIP that the DOER adopts the proposed changes to the definition of a "Low Income Property Solar Tariff Generation Unit" within the "Guideline Regarding Low Income Generation Units", and we would be happy to advise the DOER in the development of such an amended definition that includes Houses of Worship. In doing so, the DOER will ensure that equitable and sustainable solar deployment can occur in all the Commonwealth's faith-based communities.

Sincerely,



Brian D. Kuhn

Managing Principal, Associated Energy Developers



Jennifer Shankie

Co-Founder & CEO, Conservation & Sustainability Interfaith Partnership



Matthew White

Business Analyst Intern, Associated Energy Developers