



Grace Fletcher
Department of Energy Resources
100 Cambridge Street, Suite 900
Boston, MA 02114

July 25, 2025

By Electronic Submission to DOER.SMART@mass.gov

Re: *SMART 3.0 Public Comment*

Dear Ms. Fletcher,

Thank you for the opportunity to provide written comments on the SMART 3.0 proposed regulations (“SMART 3.0”), released June 20, 2025. The City of Boston appreciates the Department of Energy Resources (DOER) urgency in releasing the updated regulations to reflect the Commonwealth’s commitment to the clean energy transition.

The City of Boston is aligned with the importance of these regulations, prioritizing low-income customers and providing more accountability and transparency on the program’s goals. The City strongly supports SMART 3.0, particularly its focus on low-income customers and increased transparency and accountability. The City’s climate justice, energy, and decarbonization goals include alleviating the energy burden and supporting the evolving landscape of clean energy, which are closely aligned with the SMART 3.0 targets.

The City supports the addition of the annual review process and appreciates DOER’s effort to align the program with evolving policy and market dynamics. With the loss of federal tax credits to support the solar industry, the City requests the expansion of annual capacity allocation for 2025 and 2026, increasing the 450 MW capacity cap to 700-800 MW to meet market demand and prioritize projects in the short-term.

The City of Boston supports DOER’s tiered approach to base compensation rates by generation unit size, recognizing this approach is critical to advancing the clean energy transition. In dense urban environments, prioritizing rooftop solar is essential to achieving the City’s carbon neutrality goals. To further support residential and small commercial buildings adoption of solar, DOER should exempt projects under 25 kW from program participation costs, such as the application fee, or increase the incentive rate to reduce administrative burdens and costs, especially for low-income customers.

Given the limited land available in Boston’s urban environment, the City prioritizes rooftop solar development to meet climate and resilience goals. To support this effort, DOER should provide clear guidance to expand the definition of canopy systems to explicitly include rooftop raised racking systems, which are often necessary to comply with siting requirements



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and incur additional costs. Clarification of raised racking systems would provide financial certainty to customers and developers.

Thank you for your attention to these comments. Should you have any questions, please do not hesitate to contact me at (617) 635-0031 or Oliver.SellersGarcia@boston.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "O. Sellers-Garcia".

Oliver Sellers-Garcia
Green New Deal Director, Office of Mayor Michelle Wu
Commissioner of the Environment Department, City of Boston