

## SMART 3.0 Public Comment

7/24/25

To Whom It May Concern:

On behalf of Sun Property Group, Inc., we are submitting the following comments on the SMART 3.0 program.

- Consideration should be given to allowing systems under construction that have not yet been interconnected to qualify under the new program. Some projects will ultimately not see completion in the current market despite having broken ground. Further, it will provide macro support to developers' fighting the turbulent and decimating market changes that will undoubtedly curtail development in coming years.
- Consideration should be given to allowing some flexibility projects that fall under Top 20% (across MA) potential carbon emissions. There are many viable projects that will not be executed because of this constraint. Consider adding a mitigation fee and/or increasing the 250kW threshold.

Sincerely,



Ryan Hunt

**Ryan Hunt | Sun Property Group, Inc.**

*Principal*

T (617) 433 - 7149 | F (617) 830 - 0336

[ryan.hunt@sunpropertygroup.com](mailto:ryan.hunt@sunpropertygroup.com)

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