



2200 Atlantic Street, Sixth Floor, Stamford, CT 06902

Subject: Smart 3.0 Public Comment

On behalf of Altus Power, one of the largest owners of commercial-scale solar in the country, I am submitting a public comment regarding the proposed SMART 3.0 emergency regulations, specifically the provisions governing compensation and discounting mechanisms for solar developers and owners of net metered generation units.

Altus Power is a national leader in commercial-scale solar, serving commercial, municipal and community solar customers. Massachusetts is one of our largest markets, and we own and operate more than 150MWs in the state across 75+ assets and have delivered more than 755,472,751 kilowatt hours of clean energy across the Commonwealth. Some of our commercial and municipal customers include UMass Memorial Medical Center, Woods Hole Oceanographic Institute, Hampden-Wilbraham Regional School District, MASS MoCA, Cape Cod Healthcare, Inc., and we serve nearly 2,000 community solar subscribers in the Commonwealth.

Under the current draft of the proposed SMART 3.0 emergency regulations, solar owners are required to offer guaranteed savings based on the full value of net metered generation units, including supply, transmission and delivery charges. However, compensation to developers appears to be limited to the basic service rate, excluding transmission and delivery components. This creates a structural mismatch between the value solar owners are required to deliver to customers and the compensation they receive in return.

If this language was intentional, we request further clarification on the rationale behind this policy shift. The change represents a significant departure from SMART 2.0, where guaranteed savings were tied to Alternative On-Bill Credit (AOBC) units and more closely aligned with the compensation structure.

This discrepancy has material implications for project economics, particularly for developers of Behind-the-Meter and Standalone systems. The requirement to offer discounts on the full stack of charges while receiving compensation only on a subset of those charges may undermine the financial viability of many projects. Or said another way, it requires developers and owners to provide a discount for compensation that we're not receiving. It also introduces uncertainty into financial modeling and could deter



investment in solar development across the Commonwealth at a time when the demand for energy is escalating.

We respectfully urge DOER to account for ratepayer impact, solar costs and development costs and to revise the regulations to ensure that compensation mechanisms are aligned with the value solar owners are required to deliver to customers, (e.g. such that the compensation to developers will also include the transmission and delivery components of the charges).

We appreciate the opportunity to provide feedback and commend DOER for its continued leadership in advancing clean energy in Massachusetts. We look forward to further clarification and collaboration as the SMART 3.0 regulations are finalized.

Best,

A handwritten signature in black ink, appearing to read 'G. J.', with a long horizontal flourish extending to the right.

Gregg Felton

CEO, Altus Power