



VIA ELECTRONIC FILING

July 25, 2025

Commissioner Elizabeth Mahony
Massachusetts Department of Energy Resources
100 Cambridge St., 9th Floor
Boston, MA 02114

SMART 3.0 Emergency Regulations – BlueWave Supplemental Comments

Dear Commissioner Mahony:

BlueWave appreciates the opportunity to provide comments to the Department of Energy Resources (“Department”) in response to the June 20, 2025, SMART 3.0 Emergency Regulations filing. BlueWave submitted initial comments on the Emergency Regulations on July 21st but asks the Department to consider these supplemental comments on one additional issue pertaining to Community Shared solar projects serving low-income customers.

BlueWave commends the Department’s efforts to increase access to community solar for low-income customers and strongly supports the expanded definition of qualified low-income customer in the Emergency Regulations. However, until net crediting is implemented in Massachusetts the challenges and costs of serving this population through a traditional community solar model are prohibitively high. BlueWave supports the Coalition for Community Solar Access’s (CCSA) recommendation to delay the requirement for Community Shared solar projects to serve at least 40% low-income customers until net crediting is implemented.

BlueWave also offers an additional solution to facilitate serving low-income customers on an expedited timeline once net crediting is implemented. Existing Low Income Community Shared Solar (LICSS) projects that are operational under SMART 2.0 are experiencing unsustainably high levels of customer attrition, primarily due to customers being unable to pay a separate community solar bill. It has become prohibitively expensive to continue acquiring new customers to make up for such high levels of attrition. Because of these challenges, operational SMART 2.0 LICSS projects are being forced to consider alternative options, including dropping the LICSS Adder. Under both SMART 2.0 and SMART 3.0 rules, operational projects are allowed to add/remove an Offtaker Based Adder only one time during their tariff term. This means that operational SMART 2.0 projects may choose to remove the LICSS Adder due to the high costs and challenges of serving low-income customers without net crediting. However, under current rules, those projects will not be able to add the LICSS Adder again when net crediting becomes available in the future.

To avoid a situation where LICSS projects are forced to permanently drop the LICSS Adder and cease to serve low-income customers for the entire remainder of their tariff term, **BlueWave recommends amending the SMART 2.0 and SMART 3.0 rules to allow operational projects to add/remove Offtaker Based Adders more than once during their tariff term.** This would allow operational LICSS projects that are currently unable to serve low-income customers due to the high costs of customer attrition, to temporarily remove the LICSS Adder but add it back on the project once net crediting is implemented and projects can more effectively serve this population of customers.

Thank you for the opportunity to provide these comments. BlueWave looks forward to continuing our engagement in this process. Please contact me if you have any questions.

Sincerely,

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