

SMART 3.0 Public Comment - Good Energy, L.P.

Good Energy, L.P. has been a consultant to municipal aggregation programs in Massachusetts for nearly a decade, and we currently serve over 60 cities and towns in the Commonwealth. We assist each municipality with developing its Aggregation Plan, procuring an electricity supply for the community, overseeing the chosen electricity supplier, and providing customer support.

Many of our municipal clients have chosen to prioritize both financial and environmental goals with their aggregation program. They pursue competitively priced contracts that provide multi-year fixed prices, putting a cap on prices in volatile energy markets. These cities and towns also support the growth of renewable energy in our region, via the purchase of additional MA Class I renewable energy credits in their standard (opt-out) product. Low income Community Shared Solar via municipal aggregation is a very appealing option to many of these communities, as it would support the growth of renewable energy in our region and provide additional financial benefits to some of their most vulnerable residents.

We know that developers and owners of STGUs will have a range of options to consider for their participation in SMART 3.0, and that includes a decision as to whether to pursue the Community Shared adder, and within that, whether to pursue it through the traditional opt-in pathway or “alternative” pathway, such as through an aggregation.

It is important to note that the alternative pathway, particularly via aggregation programs, is untested and few, if any developers and STGU owners, have experience with it. As the Department reflects on all stakeholder comments, we encourage focus on any suggested improvements that could simplify and streamline the evaluation and decision-making process for developers and owners of STGUs considering the alternative CSS pathway.

Additionally, it is useful to note that until net crediting is implemented by utility companies in Massachusetts, the alternative model likely offers the most widespread promise for a one-bill solution (avoiding the need to send a second bill to a low income customer to recoup most of the bill credit, which is the typical approach in an opt-in CSS model). Municipal aggregations may be able to achieve a one-bill solution by passing the net credit through to the customer via a reduced supply rate. We believe this will be a much preferred customer experience. With roughly 200 aggregation programs approved in the State, such a solution has strong potential to reach low income customers rapidly.

We appreciate the Department's efforts to promote expansion of the benefits of solar to low income customers through the use of municipal aggregation.

Sincerely,

Patrick Roche

Patrick Roche
Director of Innovation
Good Energy, L.P.