



July 24, 2025

**VIA ELECTRONIC FILING**

Massachusetts Department of Energy Resources (DOER)  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

**Re:** *Comments on SMART 3.0 Draft Regulations – LMI Enrollment Barriers and Market Access Concerns - Commonwealth's SMART solar incentive program (225 CMR 28.00)*

Dear DOER SMART Program Team,

On behalf of Solar Simplified, I appreciate the opportunity to submit comments on the proposed revisions to the SMART 3.0 Program. While we support the Department's goals of advancing equity, clean energy access, and environmental justice, we believe several aspects of the current draft must be addressed to ensure successful implementation, particularly around Low- and Moderate-Income (LMI) subscriber qualification and community participation structure.

**I. About Solar Simplified**

Solar Simplified is one of the largest independent subscriber management platforms for community solar in the United States. Our mission is to make clean energy accessible, understandable, and equitable-connecting everyday residents and small businesses to local solar projects and monthly utility bill savings, with a customer-first approach.

We currently manage subscription services for over 300 megawatts of community solar capacity across several states, including Massachusetts, New York, Illinois, Maryland, and Minnesota. In Massachusetts, we serve projects through SMART 2.0 and aim to expand under SMART 3.0, **with an exclusive focus on residential and small commercial subscribers**. We are



not a developer or asset owner; we do not build or finance projects. Our singular role is to help projects achieve full, compliant subscription with a customer base that reflects the communities they are meant to serve.

Across our portfolio:

- **100% of subscriptions are allocated to mass-market participants** - residents and small businesses - **with no use of industrial or anchor tenants.**
- **Roughly 30% of our subscriptions are held by LMI households**, even in states where incentives for LMI enrollment are modest or non-existent.
- **We do not and will not use door-to-door or pressure-based sales tactics**, operating instead through online enrollment, customer education, and community partnerships.

As a result, we bring a practical perspective on what it takes to implement clean energy policy with consumer protection, transparency, and equity at the forefront.

## **II. Persistent Barriers to LMI Subscriber Enrollment**

The 40% LMI carve-out reflects an important and ambitious policy target, but one that remains impractical to achieve without fundamental changes to the qualification and enrollment process. As proposed, SMART 3.0 retains many of the same barriers that limited success under SMART 2.0.

Currently, qualification pathways are either (a) based on narrow geographic eligibility - restricted to households in areas at or below 65% of Statewide Median Income plus Environmental Justice (EJ) areas, or (b) dependent on burdensome income documentation and third-party validation. The draft proposal to expand eligibility to 80% of Area Median Income (AMI) is a step in the right direction. However, our review of the latest Massachusetts census tract data shows that this expansion **does not meaningfully increase** the share of population automatically eligible for LMI status under the program.



In practice, this means that **the same qualification problems that plagued SMART 2.0 will continue under SMART 3.0**, leaving subscriber organizations unable to meet the LMI allocation. As a result, many subscriber organizations have withdrawn from the Massachusetts market or significantly increased their service fees-not because LMI subscribers receive less of a discount, but because **it is extremely difficult to qualify subscribers as LMI in the first place**. Without a reliable and scalable path to verify eligibility, organizations cannot fulfill the required carve-out, resulting in under-subscribed projects and delayed revenue. **This bottleneck in LMI qualification is what ultimately undermines project economics.**

At Solar Simplified, we do not-and will never-engage in aggressive marketing tactics such as door-to-door canvassing. We believe enrollment processes must be consumer-friendly, privacy-conscious, and accessible via digital or community-based channels. Without meaningful improvements, only the most aggressive and intrusive sales models will be able to meet program requirements-an outcome we believe runs counter to DOER's intent.

**We strongly recommend the following actions:**

- **Expand geographic eligibility** to include all census tracts at or below **80% AMI**-and ideally up to 100%-in conjunction with a user-friendly mapping tool that clearly identifies eligible households.
- **Mandate issuance of self-attestation documentation within 30 days** of program launch and on an ongoing basis to prevent enrollment bottlenecks.
- **Allow for subscriber pre-approval at or near the time of enrollment**, not only after Permission to Operate (PTO), which creates multi-month delays in utility billing and project cash flow.
- **Consider including master-metered housing authorities as eligible LMI subscribers**, provided that safeguards ensure the benefits flow equitably to tenants.



### III. Anchor Allocations Undermine Mass Market Participation

In its current form, the SMART 3.0 structure allows for **up to two anchor offtakers per project**, with no minimum requirement for residential or small commercial participation. This creates a skewed incentive: asset owners are naturally inclined to secure large, creditworthy anchors—such as corporations, factories, or universities—which are administratively simpler to manage and less risky.

As a result, **mass-market non-LMI subscribers-residential households and small businesses-are being systematically excluded** from community solar participation. These are the very ratepayers who fund the program and should be central beneficiaries of it.

To address this imbalance, we propose a **restructured subscriber allocation** that restores fairness and inclusion:

- **20% of project capacity reserved for LMI subscribers**, contingent upon significant improvements to enrollment infrastructure as outlined above.
- **Up to 25% allocated to anchor offtakers** (defined as accounts >25 kW).
- **At least 55% dedicated to mass-market subscribers**, including residential and small commercial (<25 kW) customers.

This approach strikes a fair balance between programmatic goals and market realities. It also aligns with best practices from other successful community solar states that ensure meaningful residential access while enabling project financeability.



#### **IV. Conclusion**

The SMART Program remains a cornerstone of Massachusetts' clean energy strategy, and we commend DOER for seeking to refine and expand its equity outcomes. However, without structural reform to LMI enrollment and rebalancing of anchor incentives, SMART 3.0 risks repeating the inefficiencies and market exits experienced under SMART 2.0.

We urge DOER to take this opportunity to make SMART 3.0 more inclusive, more executable, and more resilient. Solar Simplified is committed to supporting this process and ensuring that clean energy access is delivered broadly and equitably across the Commonwealth.

Sincerely,

*/s/ **Aviv Shalgi***

CEO, Solar Simplified

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