



May 12, 2025

Submitted via email: DOER.SMART@mass.gov

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Ms. Samantha Meserve  
Director of the Renewable and Alternative Energy Division  
Massachusetts Department of Energy Resources  
100 Cambridge Street, 9th Floor  
Boston, MA, 02114

## High Level, Must Have Goals for SMART 3.0

Dear Ms. Meserve:

On behalf of the Sierra Club Massachusetts Chapter and our 80,000 members and supporters, we want to be sure that DOER is aware of the Sierra Club's high-level "must have" goals for SMART 3.0. We are very grateful for all the avenues that DOER has offered for providing input and acknowledge the time and effort that DOER has already invested in this critical program.<sup>1</sup>

There are 3 major goals, each of which is briefly reviewed later:

- The major emphasis of SMART 3.0 should be incentives to scale up the deployment of small and medium size solar PV and battery storage on disturbed lands, i.e. buildings and other human disturbed land of all types. These distributed energy resources (DERs) must be scaled up.
- The second emphasis should be to achieve an incentive structure for large ground mount projects that is workable for developers and for natural land protection advocates, consistent with siting and permitting reform.
- The third emphasis should be to achieve equitable outcomes for low income residents, environmental justice communities, rural communities and urban communities.

**Scale up deployments on disturbed lands and buildings.** *Scaling up small and medium size projects creates a large base of distributed energy resources which improves affordability for all ratepayers* by reducing the extent of the infrastructure that electric utilities need to build and maintain. Because transmission, distribution and substation

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<sup>1</sup> Please see Feb. 2, 2024 comments at

<https://www.dropbox.com/scl/fi/2j8z6yd0hg8ffqsj59zi1/2024-02-02-SMART-Review-Comments-Sierra-Club.pdf?rlkey=gobo20wmbj0hous7fmdt0ce97&dl=0> and

July 29, 2024 comments at

[https://docs.google.com/document/d/1W9XT5V8e9xfJMQCKMBqc\\_oY7-f3TJYT6/edit?tab=t.0](https://docs.google.com/document/d/1W9XT5V8e9xfJMQCKMBqc_oY7-f3TJYT6/edit?tab=t.0)



needs are based on peak usage, battery storage is an important distributed energy resource. The SMART 3.0 incentive structure should reward projects with local load and/or that are close to distribution lines or substations that have capacity. The least costly energy is that which we don't need to pay to have delivered to us.

*Incentives are needed to make distributed energy resource projects favorable compared to large ground mount projects*<sup>2</sup>. In particular, current incentives for commercial projects, as opposed to residential projects, do not provide workable incentives. Only about 7% of installed solar is commercial<sup>3</sup>.

*Stable incentives for distributed energy projects will expand employment for our local workforce with stable jobs*. By contrast, less than 4% of solar jobs are for utility scale projects<sup>4</sup>.

*Capacity limits and declining block incentives should be eliminated for all solar projects on buildings and disturbed land*. With the on-going difficulties with offshore wind the need to maximize solar to the extent possible close to load has never been greater. We should not limit these priority projects.

**Create a workable, balanced incentive structure for large ground mount projects.** Large ground mount projects are affected both by incentives and by siting and permitting regulations. *DOER should have the goal of using the same land classification system for SMART incentives as are or will be used for siting and permitting reform*. Consistency is key.

Via incentives or disincentives SMART has influence over the viability of large ground mount solar or battery installations. There are important considerations beyond the use of a land classification system such as impact analyses, cumulative impact studies, and whether or not the community is an environmental justice community.

**Create equitable outcomes.** Not all lands and communities have equal potential to generate or store solar energy. Some face the prospect or reality of hosting greater solar PV or battery storage than others. *SMART should include a long term Community Benefit Adder for large projects*. As compensation for a large project, the community should get a revenue stream to help fund project(s) that the community desires, e.g. a community center, resiliency work, etc.

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<sup>2</sup> The cost of a large ground mount project, which is always far from where the energy will be used, is just a part of the cost. Ratepayers pay the utilities for their infrastructure build out.

<sup>3</sup> This calculation is based on Table 6 in the DOER Technical Potential of Solar study.

<sup>4</sup> This figure comes from the Solar Foundation Solar Jobs Census:  
<https://irecusa.org/programs/solar-jobs-census/>



*SMART 3.0 should provide higher levels of incentives for Environmental Justice communities*, both for distributed resource projects located within the community and incentives that make access to solar PV and/or storage resources especially attractive.

Sincerely yours,

Vick Mohanka  
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