



Greenfield Solar  
2 Fiske Ave  
Greenfield MA 01301  
413-772-3122

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DOER

RE: Smart 3.0 comments

Thank you for the opportunity to comment on the emergency regs for SMART 3.0.

Greenfield Solar is a residential and small commercial solar PV system installer in Western Mass operating since 2005. We install on properties that range from ¼ acre to 200+ acres. Cell and internet service is spotty at best. There are perfectly situated barns and outbuildings which should be allowed interconnection and net metering credits and contribute to the Commonwealth's GHG reduction goals.

The SMART incentive for <25kW is not enough to overcome the metering issues and costs. And frankly it can't as outlined below for many rural locations.

### **SMART Metering Issues**

#### **Implications of H.4144**

An Act Relative to Energy Affordability, Independence and Innovation, [H.4144](#) Section 39, requires enrollment in SMART for all solar PV systems in order to receive NM credits. This would be onerous financially and physically for a <25kW system owner. Requiring SMART incentive enrollment will reduce the ability for many rural locations to take advantage of perfectly sunny barn roofs and tracker locations with ample solar access. Restricting NM credits to only SMART enrolled solar pv systems is draconian. There are better, simpler and cheaper ways to incorporate solar pv generation into the Commonwealth's GHG reduction goals through manual reporting to the PTS for Class I RECs.

**Location requirements for SMART meters are financially onerous and physically impossible in rural locations.** The SMART meter is required to be located within 10' of the utility meter. This example illustrates the impossibility and costs. The ground mounted PV array is 150' from the Barn subpanel which is 200' from the house service panel and utility meter location. An extra 350' trench from the ground mounted array to the house just to locate the SMART meter 10' from the utility meter is financially prohibitive. The Ground mounted array would be tied into the barn subpanel which doesn't allow the SMART meter to be located 10' from the utility meter at the house. The SMART meter has to be added before any electrical loads use the generation in order to be counted towards the incentive value. Is it possible for the SMART meter to be located before the barn subpanel? This has been discussed with the utilities to no avail.

**Meters required by SMART are wired into the sockets differently than simple production meters.** At the end of 20 years when the smart incentive ends and the meter is removed, a customer will be left with an inoperable PV system because the meter socket will be empty and hard to replace due to the different wiring system. How are they going to find a production meter at the local hardware store? and pay for an electrician to rewire the meter socket because it is reverse wired? Additionally, after 20 years, they aren't the original owners and have no idea how the pv system works.

Additionally, there is typically little to no cell or internet service at many rural locations in Western Mass. This reduces the ability for automatic reporting devices to upload production data to the PTS.

To solve the SMART metering and reporting concerns above, **DOER needs to allow manual reporting to the PTS for all <25kW systems to report for Class I RECs**. Manual reporting already exists for SREC I and II systems. As those SREC systems transition to Class I RECs, they are continuing to manually report to the PTS. By allowing new <25kW PV systems to manually report to the PTS, DOER gains access to generation data at the cheapest, simplest and known process. Furthermore, manual reporting of Class I RECs is a sufficient record of production for meeting the Commonwealth's GHG reduction goals.

Additionally, DOER needs to work with the legislature to remove section #39 from H4144 so that all solar PV systems have the right to choose the most financially beneficial and possible avenues for reporting production. Don't force system owners into a box that won't fit and reducing access to net metering credits or limiting viable locations.

Financing and interest rates will still be costly and cause many low and moderate income homeowners to forgo installing solar pv systems. Don't increase costs by adding SMART requirement costs.

#### **Lastly, we advocate for a Directional Adder**

DOER should also consider creating a west-facing adder to encourage solar generation to offset peak demand. South-Southwest / West facing would be optimal. There is no additional installation cost for west facing roof systems, but orienting a ground mounted array to favor west could reduce the total generation possibilities of south facing. There may be locations which are not being considered for development due to shading from the east which limit generation of a south facing array. If west facing was favored, and incentivized, east shading would not be a detriment. The value of the adder would depend on calculations of reducing peak demand costs. More West facing arrays could reduce the summer peak load from 4-8pm and potentially move it to 5pm or even 6-8pm.

#### **In conclusion**

Simply allow manual reporting to the PTS for all <25kW systems. Class I RECs will be a sufficient incentive with the proposed increased state tax credits to partially overcome the lack of the IRA for many customers. Don't require enrollment in SMART 3.0 in order to be eligible for Net metering credits. That condition will only limit solar installations especially in rural locations. The SMART incentive doesn't fit all installation situations.

Thank you for your time and consideration,

Claire Chang

claire@solargreenfield.com