

Subject: Proposed Revision to 225 CMR 20.05(5)(k) – Exclusion of Roof-Mounted PV Systems from the Energy Storage Requirement

Dear DOER Team,

On behalf of NRGTree, we respectfully propose a revision to 225 CMR 20.05(5)(k) – Energy Storage Requirement, specifically to exclude roof-mounted photovoltaic (PV) systems from this requirement.

Rationale:

1. Voltage Compatibility Constraints:

Current electrical code limits roof-mounted systems to a maximum of 1,000V DC, while the majority of commercially available battery energy storage systems are optimized for 1,500V DC configurations. This discrepancy significantly limits the feasibility of DC-coupled battery integration for rooftop systems in Massachusetts, making compliance with the energy storage requirement technically challenging and economically inefficient and creates multiple points of potential failures.

2. Permitting and Development Barriers:

Incorporating batteries into rooftop solar projects substantially increases permitting complexity and project timelines. Developers often face prolonged interconnection reviews and local permitting hurdles when storage is included, especially in urban or mixed-use buildings.

3. Impact on Project Viability and Solar Deployment:

These added burdens result in higher development costs and discourage full utilization of viable rooftop space—despite strong interest and commitment from property owners. In many cases, the storage requirement becomes a barrier to project advancement, thereby undermining the broader goals of the SMART program to accelerate solar deployment.

Recommendation:

We urge the Department to amend 225 CMR 20.05(5)(k) to exempt roof-mounted PV systems from the mandatory energy storage requirement, in order to align regulatory design with technical realities and market conditions. This change would enable greater adoption of rooftop solar in Massachusetts, particularly on commercial and industrial buildings, without compromising system reliability or grid integration.

We appreciate the Department's continued leadership in advancing clean energy across the Commonwealth and thank you for considering this recommendation.

Sincerely,
The NRGTree Team