



BY ELECTRONIC MAIL ONLY

July 25, 2025

Massachusetts Department of Energy Resources  
100 Cambridge Street, 9th Floor  
Boston, MA 02114  
[DOER.SMART@mass.gov](mailto:DOER.SMART@mass.gov)

Subject: SMART 3.0 Program Emergency Regulations

Thank you for the opportunity to provide input regarding DOER's proposed SMART 3.0 program emergency regulations. Founded in 2008 and based in Cambridge, PowerDash has been a Massachusetts Benefit Corporation since 2013. This designation enables and impels our company to provide environmental and social benefits to our community, with a special focus on the Commonwealth, rather than focusing solely on profitability.

PowerDash is an independent, third-party verifier, reporting over 25,000 systems to NEPOOL GIS – the overwhelming majority of which are residential solar installations. We help our customers to streamline the reporting of Renewable Energy Certificate (REC), Solar Renewable Energy Certificate (SREC) generation, and Clean Peak Energy Certificate (CPEC) generation; and ensure compliance with production tracking requirements. We care deeply about both the integrity of Renewable Portfolio Standard (RPS) policies and about the health of the region's clean energy economy.

### **SMART 3.0 should not be mandatory**

DOER's proposed SMART 3.0 emergency regulations require all solar installations in the state to participate in the SMART program. This requirement would hinder market development in Massachusetts because of the increased installation and maintenance cost associated with the forced use of an unnecessary, utility-provided production meter. This is an outdated approach to ANSI C12 revenue-grade metering for Distributed Energy Resource (DER) systems. It will significantly increase the cost and administrative overhead for residential solar installations, at a time when the industry is already facing massive challenges to financial viability because of policy changes at the federal level.

### **Why a more flexible approach to REC program participation and metering is needed**

1. A DER production meter is required for a variety of needs independent of the utility/distribution company's needs. For example, many financing arrangements such as Third-Party Ownership (TPO) scenarios and Power Purchase Agreements require independent, revenue-grade production metering. If the utility/distribution company owns the production meter, that will require the leasing/PPA provider to have redundant



production metering and communications. This additional cost will have to be passed on to solar installers and system owners, compromising the financial viability of projects.

2. With the trend of having an ANSI C12 production meter integrated into inverter manufacturer offerings (such as the Enphase IQ Envoy and Tesla Powerwall 3), having SMART 3.0 be mandatory forces a separate utility-owned production meter approach that is at odds with current technology evolution in the marketplace. Having the production meter component as an integrated component is a cost-saving development, making solar more cost-effective and accessible generally.
3. PowerDash, as a Massachusetts-based business actively serving as an Independent Verifier for NEPOOL GIS, continues to evolve our innovative RPS reporting platform, which is directly integrated with manufacturers like Enphase and Tesla, using automation and personalized service to increase integrity and lower costs for REC program participation.
4. With the increasing development of solar-plus-storage solutions, new grid services business models are developing that would significantly alter the current relationships between solar system owners and utility/distribution companies. In some of those service scenarios, it would be cumbersome and likely a conflict of interest for a utility/distribution company to serve as the primary production metering provider for the system owner. Grid services markets need the integrity and transparency associated with independent, third-party production and storage export metering.

For the above reasons, we believe it is essential that SMART 3.0 not be mandatory. Stakeholders need to have the freedom to select the mode of REC program participation that best suits each project's context.

Thank you again for the opportunity to provide input on this important policy development.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Lapointe". The signature is fluid and cursive, with the first name "Stephen" and last name "Lapointe" clearly distinguishable.

Stephen Lapointe  
Co-Founder and CEO