

July 25, 2025

Massachusetts Department of Energy Resources
Comments on SMART 3.0 Program

To whom it may concern,

On behalf of Solect Energy, we thank the Massachusetts Department of Energy Resources for taking decisive action and filing emergency regulations for the next generation solar program. SMART 3.0 considers a multitude of topics, incorporates feedback from a wide range of stakeholders, and offers a strong foundation for solar energy adoption in Massachusetts.

We respectfully offer these comments intended to refine a few key sections of the regulations.

Capacity

Given the developments in federal policy and the sunset of the Investment Tax Credit, time is of the essence for projects to secure the value of the ITC in their solar project. We recommend operating the Program Year 2025 and Program Year 2026 periods with no capacity limits.

28.05. (3)(c): The 25-250kW AC should be uncapped throughout the program duration. The regulation allows the Department to allocate additional capacity, but it's not assured to happen and as written risks slowing project deployment in a system size that fits on a high percentage of commercial building rooftops.

Qualification

28.07 (4)c.(i) & d: Support for Public Entity Preliminary Statement of Qualification Carve Out. We support the current qualification standard for public entities.

Value of Energy

The current formula for calculating Value of Energy and corresponding Incentives do not adequately support behind the meter solar projects, for both customer owned and for Third party owned models. The consistent cost inflation of grid delivered power has squeezed incentives to zero or near zero across most commercial and industrial meter types for several years during the SMART 2.0 program, and is a contributing factor to the decline of systems coming online. We recommend a relatively simple fix to set a minimum incentive in the base tariff for behind the meter projects, perhaps .06. That amount will exceed compensation available from class 1 RECs, and incentivize projects for all C&I meter classes.

Timelines

The currently proposed timeline to receive a PSoQ could reach 90 days. We recommend a 30 day approval period for qualified project applications properly submitted. This is especially important to meet Start of Construction and Placed in Service timelines required for the federal ITC.

Adders

The adder for 1MW AC projects is a great addition that will encourage larger projects to come online. The 1MW threshold however does trigger ISO-NE review and adds a minimum of 1 year in ASO study. We recommend the threshold for this Adder could be reduced to 900kWAC.

Raised racking on rooftops costs more than standard roof racking, and less than parking canopies. Some rooftops are good candidates for raised racking to support solar above other mechanical equipment, and there are thousands of rooftops we've researched with rooftop equipment that we've disqualified from interest due to lack of area for solar. We suggest the Department establish a raised roof racking Adder that at .06 for the portion of the project that uses raised racking.

Energy Storage incentives are valuable and will prove useful for projects where it's beneficial and can be executed. However, due to interconnection and a host of other complexities, inclusion of Storage should be optional but not required under SMART 3.0.

Repowering

Including incentives for repowering of Existing solar projects is a valuable inclusion. This extends the financial and decarbonization values of the site, and leverages the existing Interconnection Agreement and local permissions. When a project is a complete rebuild, it costs more than a new build that doesn't have high interconnection fees, because the existing project needs to be replaced before the new project can be installed. We recommend allowing these rebuilds to be eligible for incentives that match the new project values and removing the 50% amount as written.

Thank you for the opportunity to provide these comments.

Respectfully submitted,

Matt Shortsleeve

Matt Shortsleeve
Sr. Vice President