

Dear Commissioner Commissioner Judith Judson,

I am writing as a solar supporter to ask that you substantially improve the Solar Massachusetts Renewable Target (SMART) program.

Ms. Judson, if you look at the numbers of proposed solar projects larger than 25 kw that have failed to be built, or are waiting in long queues, due to the egregiously tight net-metering caps that our legislators have permitted Eversource and National Grid to impose, you will see that if the market had been allowed to grow as much as it wanted to at full retail net-metering rates, and if distributed-PV projects were not being hit with egregiously high interconnection charges and interconnection delays (especially from Eversource), the "1600 MW target" for solar production in the Commonwealth would likely have already been reached.

Certainly since the investor-owned utilities began to fight the previously robust growth of DISTRIBUTED SOLAR--around 2013 and 2014--we have seen a decline in the GROWTH of new solar jobs and companies in Massachusetts. This "ramping down" of what was previously one of the fastest-growing employment sectors in the Commonwealth is tragic on many levels: jobs, economic development, the health of our local tax bases, the security and resilience of our energy supply in an era of cyber-attack and extreme weather events, and all of the harms and costs that weigh on all of us as a result of runaway climate change.

Continued solar growth is critical to the Massachusetts economy and keeping our environment clean and safe for our families and future generations. The proposed SMART program should be changed in the following ways:

- 1) Set the incentive levels at a level that will encourage continued solar development and protect solar jobs in the Commonwealth. The competitive process to set these levels should be allowed a higher ceiling to insure the entire program will work in the years to come.
- 2) Additional support (adders) for community-solar, low-income solar and other priority development should be protected from decline over time to ensure continued and accelerated growth of these types of projects.
- 3) Remove the caps on these adders, so that community solar, low-income solar and solar with storage will be encouraged as much as possible. Caps on the total capacity of projects that can qualify for these adders, and the cap on total adders any given project can use, must both be removed.
- 4) Use the technical expertise and influence of the DOER to press Governor Baker and our Legislature for a removal of all caps on net-metering. Apply your influence in support of doing away with split "retail" and "wholesale" net-metering rates; and in support of full retail-value electricity credit for all solar PV production that feeds energy into the electric grid.

The SMART program has not proposed any adequate replacement for net metering and will not be successful without the continued existence of fair and full compensation for solar customers in the Commonwealth.

5) Please reference the "Smart Comments" letter you have received from Pope Energy. Adopt all of the recommendations in this letter that pertain to agricultural sites, municipalities, and canopy installations such as parking lots.
And give significant consideration to the other recommendations in that letter.

6) Regarding Section 20.09 Solar Program Administrator.

It has been reported that DOER is considering assigning the administration of SMART to the utilities. This would be an UNMITIGATED DISASTER for any solar developers or owners, large or small, other than the utilities themselves. The investor-owned EDCs have been trying to accomplish this kind of control over solar development in the Commonwealth for many years and through many legislative attempts, commissions, regulations, and agencies. DO NOT ALLOW THIS.

As one single, sometimes low-income, utility customer--one who owns and manages five living units in two buildings--I have personally had more than 10 experiences with the deficient service and exorbitant waste of ratepayers' money through the MassSave program. As I did research, spoke with vendors in the program, and attended meetings and hearings of the Energy Efficiency Advisory Council, I discovered that at least 90% of the inefficiency, inadequate services, and waste in MassSave program is a DIRECT result of this program being administered by the IOUs.

Please do NOT replicate this SHAMEFUL example of the "fox operating the chicken coop" for solar-policy implementation in Massachusetts!

Although these comments are my own and do not necessarily represent an official position of my Town government, I serve as the Energy Policy Liaison for the Town of Montague, and as a member of the Montague Energy Committee (MEC).

Thank you kindly for reviewing and considering my comments.

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Sincerely,

Ariel Elan

