



July 11, 2017

Judith Judson
Commissioner, Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: SMART Program Comments and Floating Solar Inclusion

Dear Commissioner Judson,

Thank you for the opportunity to provide comment on the Massachusetts Department of Energy Resources' (DOER) development of the Solar Massachusetts Renewable Target (SMART) Program, 225 CMR 20.00. The Cape Cod Cranberry Growers' Association (CCCGA) represents more than 325 cranberry growers in Southeastern Massachusetts, Cape Cod and Nantucket. These growers farm 13,250 acres of cranberry bog and maintain more than 60,000 acres of wetland and upland support property. Cranberries are the largest agricultural food commodity produced in the state with an annual crop value of \$68.9 million dollars. According to the most recent Farm Credit East Knowledge Exchange Report, the Massachusetts cranberry industry provides over 6,900 jobs and a total economic benefit of over \$1.4 billion to the Massachusetts economy.

CCCGA is a supporter of DOER's efforts to expand the footprint of solar throughout Massachusetts and commend the efforts of the DOER to craft a program that recognizes the benefits and opportunity of agricultural land. Overall, we see the value in the SMART Program and like the changes that have been made since the initial public draft. However, we do have some specific areas where we have concern and also an additional area of support that we would like to see included.

First, we would like to see in the program the inclusion of floating solar, with its own designation and adder. Similar to how Agricultural Generating Units have their own criteria and financial adder, floating solar should be allowed and incentivized. For some agricultural producers, having the option to construct floating solar on their wholly-owned irrigation ponds may provide a valuable location to source panels without sacrificing agricultural land. Farmer's most valuable asset is their land and having more choices as to where to site potential solar projects is important.

Next, we have concern with the definition of "Land in Agricultural Use", 20.02: Definitions, it denotes that this land must be in M.G.L. Chapter 61A. Although this wouldn't be a problem for most ag producers, there are some who choose not to have their land in this tax program and they should not be precluded from participating in the SMART Program or benefitting from the Agricultural Solar Tariff Generation Unit

Cape Cod Cranberry Growers' Association

One Carver Square Boulevard • P.O. Box 97 • Carver, MA 02330
Telephone: (508) 866-7878 • Facsimile: (508) 866-4220
Email: cccga@cranberries.org • Web www.cranberries.org



Adder for simply not having their farm enrolled in Chapter 61A. Land in Agricultural Use should be defined as it has been in numerous other state regulations, such as 310 CMR 10.04 without the need for Chapter land designation.

Further, for projects that could qualify as "Land in Agricultural Use" but will not be part of the active cropping land, growers should be allowed to enjoy the benefits of the Agricultural Solar Tariff Generation Unit Adder without incurring all of the restrictions found within the special provisions section. For example, a cranberry grower may elect to place solar panels on the dike on the outside edge of his cranberry bog, not within the bog itself. This would still be considered land in agricultural use but having to place these panels 6-feet high would not be necessary and would result in extra cost, decrease the panel's capacity and introduce more complications. There should be some reasonable flexibility with the special provision particulars of an agricultural project, which would vary depending on the location and/or the type of agricultural operation. In these unique situations, the farmer would be able to qualify for the Agricultural Solar Tariff Generation Unit Adder but not necessitate the need for special structures.

In closing, we support DOER's efforts to create a SMART Program for encouraging solar development in Massachusetts. With consideration for the changes noted above, we think that an effective program can be achieved for agricultural producers. Having more options available to farmers for siting solar projects will provide opportunities to have their farm remain (or become) sustainable, helping to keep the fabric of local communities intact by preserving valuable open space, maintaining jobs, growing local food for consumers and simultaneously increasing sources of solar energy. We look forward to the prospect of having more solar generation in Massachusetts. Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Wick".

Brian Wick
Executive Director

Cape Cod Cranberry Growers' Association

One Carver Square Boulevard • P.O. Box 97 • Carver, MA 02330
Telephone: (508) 866-7878 • Facsimile: (508) 866-4220
Email: cccga@cranberries.org • Web www.cranberries.org