

*The City of Fitchburg*  
*Massachusetts*  
OFFICE OF THE MAYOR

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July 10, 2017

Governor Charlie Baker  
Massachusetts State House  
Office of the Governor, Room 208  
Boston, MA 02133

Re: Economic Restrictions on Fitchburg under SMART

Dear Governor Baker:

During my time in the Legislature, I served as Vice Chair of House Committee on Global Warming and Climate Change. Parallels can be drawn with your leadership in the SMART program and our continued effort to improve our environment. With the proposed SMART program policies under development by the Executive Office of Energy and Environmental Affairs, there are a few concerns I would like to bring to your attention. According to the SMART policies proposed, landowners, businesses, state universities, municipal agencies and the City of Fitchburg will be unable to participate in the SMART program because the existing solar backlog makes the SMART program oversubscribed. Other than residential solar, the City of Fitchburg will be unable to participate in the SMART program.

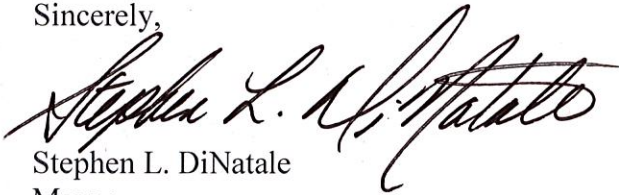
Unfortunately, Unitil's service area not only affects the City of Fitchburg, but also Lunenburg, Ashby, and Townsend. These communities and their taxpayers should have the same access to participate in the SMART energy economy as those taxpayers in the National Grid or Eversource service territories. Unitil is the most expensive Investor Owned Utility (IOU) in the Commonwealth, and their service territory in Massachusetts is more rural, less populated and less affluent. Why should Fitchburg and other taxpayers in municipalities serviced by Unitil not be able to benefit from this new energy economy?

On behalf of the City of Fitchburg, I request that any and all caps, SMART "Block Capacity Allotments" including net metering caps be removed, so that solar PV and other renewables can continue to be installed in Unitil's service territory. The City of Fitchburg requires your leadership and advocacy to allow our citizens, businesses and municipal governments to participate in this renewable energy transition and the economic benefit that it will provide.

Two years ago you visited Hollis Hills Farms in Fitchburg and saw their maple syrup operations. The owner, Jim Lattanzi, recently informed me that his 3MW solar project may be built at a penalty, or there may be restrictions as to sizes of agricultural uses on solar, and that his three (3MW) megawatt solar project may not be allowed to be built until the second "capacity block allotment". Hollis Hills Farm is the type of entrepreneurial spirit needed in Fitchburg and we need to encourage their growth and success. Agricultural Solar Tariff Generation Units should be allowed the same project size allotment as all other solar systems, not just 1 MW project size as currently provided. Hollis Hills Farm needs this additional revenue as another means of supporting farming operations.

As Mayor of Fitchburg, I am respectfully requesting that DOER and DPU remove any SMART Block Capacity Allotments in Fitchburg and the entire Unitil territory, and let the municipalities control how much is built in our cities and towns.

Sincerely,

A handwritten signature in black ink, reading "Stephen L. DiNatale". The signature is fluid and cursive, with the first name "Stephen" and last name "DiNatale" clearly legible.

Stephen L. DiNatale  
Mayor



# Capacity Block Allotments

- Blocks will be divided proportionally using distribution load data:

| Distribution Company | 2015 Distribution Load (MWh) | % Share of Distribution Load |
|----------------------|------------------------------|------------------------------|
| Mass Electric        | 21,750,244                   | 45.3%                        |
| Nantucket            | 176,717                      | 0.4%                         |
| NSTAR (Eversource)   | 21,896,222                   | 45.6%                        |
| WMECO (Eversource)   | 3,708,396                    | 7.7%                         |
| Unitil               | 476,026                      | 1.0%                         |
| Total                | 48,007,605                   | 100.0%                       |

- Initial competitive procurement will be for a total of 100 MW and will be divided proportionally amongst the distribution companies
- National Grid, NSTAR, and WMECO will have 8 blocks, with a 4% decrease between blocks
- Unitil and Nantucket could have less blocks, for example, 4 blocks with a 8% decrease in between blocks, or 2 blocks, with a 16% decrease between blocks
- All blocks will have a minimum of 20% reserved for projects  $\leq 25$  kW AC
- Could also consider maximum amounts for certain project types

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Creating A Clean, Affordable, and Resilient Energy Future For the Commonwealth



## Illustrative Block Capacity Allotments

### Capacity Available to All Project Sizes

| Distribution Company   | Competitive Procurement | Block 1 (only projects $\leq 1$ MW) | Block 2 | Block 3 | Block 4 | Block 5 | Block 6 | Block 7 | Block 8 | Total  |
|------------------------|-------------------------|-------------------------------------|---------|---------|---------|---------|---------|---------|---------|--------|
| Massachusetts Electric | 45.3                    | 27.2                                | 72.5    | 72.5    | 72.5    | 72.5    | 72.5    | 72.5    | 72.5    | 580    |
| Nantucket Electric     | 0.4                     | 2.2                                 | 2.2     | N/A     | N/A     | N/A     | N/A     | N/A     | N/A     | 4.8    |
| NSTAR                  | 45.6                    | 27.4                                | 73      | 73      | 73      | 73      | 73      | 73      | 73      | 584    |
| WMECO                  | 7.7                     | 4.2                                 | 12.4    | 12.4    | 12.4    | 12.4    | 12.4    | 12.4    | 12.4    | 99.2   |
| Unitil                 | 1                       | 2.95                                | 2.95    | 2.95    | 2.95    | N/A     | N/A     | N/A     | N/A     | 12.8   |
|                        |                         |                                     |         |         |         |         |         |         |         | 1280.8 |

### Minimum Capacity Available to Projects $\leq 25$ kW

| Distribution Company   | Block 1 | Block 2 | Block 3 | Block 4 | Block 5 | Block 6 | Block 7 | Block 8 | Total |
|------------------------|---------|---------|---------|---------|---------|---------|---------|---------|-------|
| Massachusetts Electric | 18.1    | 18.1    | 18.1    | 18.1    | 18.1    | 18.1    | 18.1    | 18.1    | 144.8 |
| Nantucket Electric     | 0.4     | 0.4     | N/A     | N/A     | N/A     | N/A     | N/A     | N/A     | 0.8   |
| NSTAR                  | 18.2    | 18.2    | 18.2    | 18.2    | 18.2    | 18.2    | 18.2    | 18.2    | 145.6 |
| WMECO                  | 3.1     | 3.1     | 3.1     | 3.1     | 3.1     | 3.1     | 3.1     | 3.1     | 24.8  |
| Unitil                 | 0.8     | 0.8     | 0.8     | 0.8     | N/A     | N/A     | N/A     | N/A     | 3.2   |
|                        |         |         |         |         |         |         |         |         | 319.2 |

