

7/11/2017

To: DOER Commissioner Judith Judson  
From: Steve Cowell, President, E4TheFuture

Re: Solar Massachusetts Renewable Target (SMART)

Please accept these comments in response to the emergency regulations on the Solar Massachusetts Renewable Target (SMART) program. E4TheFuture is a 501(c)3 non-. Below, we suggest several critical improvements to the SMART program that we hope you will adopt in the final regulations and tariffs. Continued solar growth is critical to the Massachusetts economy and keeping our environment clean and safe for our families and future generations.

***Please consider the following adjustments to the SMART Program:***

- 1) *Redesigning the hard caps on Community and low income solar.* The currently proposed 320 MW cap will create a disincentive for development of these critically needed project, especially as the cap nears. Community and low-income projects frequently take additional time to develop, and as the cap nears, many projects will not move forward in anticipation of removal of the adder. This creates further instability in market segments that are just beginning to significantly expand (community solar) and those that serve citizens without proportionate access to solar electricity due to financial constraints or physical barriers (roof space, rental status). E4 suggests a lowly declining adder block that will provide a “soft-landing” signal to projects do not get in under the initial adder rates.
- 2) *The Low Income adder should reflect the actual proportion of low income subscribers in a community project, instead of the 50% threshold currently proposed.* For example, under the current SMART guidelines, a community solar project could have 40% of its subscribers fall within the SMART LI guidelines and receive no compensation for serving that sector of the community; while a project with a 55% LI subscriber base would qualify to receive the adder on 100% of its generation units. E4 proposes a proportional adder that compensates projects for their actual numbers of LI subscribers – simply put, a project would receive the adder on a percentage of their generation units equal to the demand of their LI subscribers. This change would ensure that projects that serve a significant LI (but < 50%) population are compensated while not overcompensating projects that just barely meet this threshold with full adder attribution to 100% of their generation units.
- 3) *Set the base compensation rate to a more sustainable level.* By setting a firm base compensation rate at the outset of the SMART program, projects will be more able to build a financial planning model resulting in reasonable investment options throughout the life of the Program. We suggest a minimum of \$.175/kWh as a base compensation rate. We also suggest the DOER could adjust base compensation rates in the event of steep cost increases or decreases, in order to maintain equitable compensation for solar owners and the ratepaying public.

Thank you for the hard work on ensuring that Massachusetts remain a national leader in the transition towards a clean energy supply and economy.