

June 22, 2017



Commonwealth of Massachusetts
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA, 02114

Subject: Public Comments on the SMART program 225 CMR 20:00

ECA SOLAR LLC is please to submit the following comments on the SMART program, 225 CMR 20:00.

- The SMART program places an unfair penalty on behind the meter systems. As currently crafted in the draft SMART program, it subtracts out the full retail tariff value on the basic supply; rather than a competitive supply rate. Effectively the program does not take into account the accurate avoided costs. This dilutes out the customer savings. Given the challenges associated with calculating incentives off a myriad of different competitive supply rates the solution is to incentive behind the meter generation units. Specifically, the solution is adding two (2) cent per kilowatt Compensation Adder for behind meter solar generation. This change is consistent with the SREC program which provided higher incentive levels (Market Segment B) for behind the meter generation.
- The incentive adder for Building Mounted generation (aka rooftop) is incomprehensibly low. In most scenarios, the structural costs, maintenance, roof repair costs that occur in New England make most rooftop projects non-economic. The Compensation Adder for Building Mounted generation should be increased from two (2) cents per kWh to four (4) cents per kWh.
- A public entity that receives and controls 100% of the output from a solar facility should qualify for public entity compensation adder at two (2) cents per kWh. The draft SMART regulations is not consistent with the net metering policy. Solar facilities produce clean and renewable energy; that is what is important. What should not matter is the private property vs. public property site location. Furthermore, just because one public entity does not have the property assets compared to another affluent public entity does not mean the project should be marginalized. In closing, any public entity that receives and controls 100% of the output from a solar facility should be allowed to receive the public entity Compensation Adder of two (2) cents per kilowatt hour.

Kind regards,

Todd E. Fryatt

President, ECA SOLAR

A handwritten signature in black ink that reads "Todd E. Fryatt". The signature is stylized with a large, looped "T" and a cursive "Fryatt".