



July 11, 2017

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

**Re: Comments the Solar Massachusetts Renewable Target (SMART)
Program (225 CMR 20.00)**

Dear Commissioner Judson,

The Environmental League of Massachusetts (ELM) is pleased to be able to offer these comments on the above referenced regulations. ELM advocates for, among other things, policies that will help combat climate change, foster the development of new sources of clean energy and the achievement the mandates of the Global Warming Solutions Act.

We offer a few comments on the design and implementation of the SMART program regulations as discussed in further detail below.

First, ELM supports the overall concept of the SMART program. In theory, the approach envisioned by DOER with the SMART program should be able to offer incentives to achieve the goal of an additional 1600 MW of installed solar photovoltaics (PV) in Massachusetts.

ELM, however, urges the DOER to maintain a stable solar incentive program for the foreseeable future so that developers can create and execute viable business plans that will bring more solar onto the grid and reduce our reliance on fossil fuel generators and the greenhouse gas emissions associated therewith. Continually changing the PV incentive regulatory landscape sets unnecessary obstacles in the road to reducing greenhouse gas emissions and protecting the environment.

One area of improvement in the SMART program involves the incentives for low-income and community PV. The SMART program's use of arbitrary adder caps increases the complexity and uncertainty of the SMART program and provides no guarantee a specific adder would be available by the time a project is ready to submit its SMART program application. This element of the program will have a chilling effect on community shared solar ("CSS") and low-income solar projects, which often have long lead times and are more complicated to develop than other

types of solar projects. The loss of an adder for one of these projects would almost certainly stop the development process in its tracks.

In addition, SMART permits certain solar projects to combine adders. This would allow a low-income rooftop project, for example, to combine two adders (i.e. building mounted adder and low-income adder) to receive the compensation necessary to be built. However, the rooftop adder is available to any rooftop solar project over 25kW and the cap for this adder could easily be reached early in the SMART program. In this case, such a low-income rooftop project would not succeed if, during the development process, the rooftop adder is no longer available. Instead of achieving any intended purpose, the adder caps serve as an unnecessary barrier and add a layer of uncertainty to the project development process.

Sincerely,

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