



the campaign for  
environmentally responsible  
health care

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

**RE: SMART solar incentive program comments**

Dear Commissioner Judson,

On behalf of Health Care Without Harm (HCWH) we appreciate the opportunity to comment on the emergency regulations for the Solar Massachusetts Renewable Target (SMART) program. We thank you and the MA DOER team for your work to transition the Commonwealth to renewable energy backed by robust clean energy storage. Solar energy is a phenomenal resource for the Commonwealth, its roughly 18,000 jobs and 1600 megawatts of installations have helped to lower harmful pollution while helping power the State's economy.

As you may have seen in the news, in May HCWH released analysis of metro Boston Green Ribbon Commission health care sector's energy and GHG, which showed the sector is protecting population health in achieving a >27% reduction in GHG in 2017 compared to 2011, and is on track to achieve a 47% reduction compared to business as usual by 2020. In addition, our just-released report "*Resilience 2.0: Healthcare's Role in Anchoring Community Health and Resilience*" **also highlights the important roles renewables, solar and grid infrastructure play in assuring our most vulnerable citizens and communities do not suffer additional, if unintended, environmental health impacts and injustices.** State law, programs, incentives and staff have greatly assisted our sector in all these areas.

Unfortunately, while Massachusetts' existing solar programs have put the state at the forefront of solar in the country, the solar has not been equitably distributed. Less than 5% of the solar currently installed in Massachusetts serves low income residents or affordable housing developments. **We urge DOER to assess and adjust the SMART regulations to reduce negative impacts on low income communities and households, which are also the most health-impacted and vulnerable.** As written, the SMART program fails to demonstrate a real commitment to equity, introduces new barriers that will inhibit low-income and shared solar projects, **and exacerbates environmental health threats for those least able to withstand them.**

More than 65,000 homeowners, primarily in the suburbs, have installed solar on their roofs, representing over 40% of the total solar in the state. For communities served by Eversource, including Boston, homeowners are getting more than 12 times as much solar as affordable housing developments, tenants and low income residents. Increasing solar's ability to serve everyone, including low-income communities, hinges upon expanded opportunities for shared and community solar projects, which allow

the benefits of solar to be shared with anyone, even if they don't own a sunny rooftop. To do this, SMART must provide sufficient compensation for these projects and have a well-designed tariff design.

We recommend a number of changes to the regulations and program:

1. Create a carve-out or dedicated portion of the incentive to ensure low-income and community solar thrives, making the overall solar incentive high enough to support solar development,
2. Revise restrictive definitions of low-income that will leave many communities out, and ensure there is an "on-bill" mechanism like net metering to deliver the savings to those who most need and deserve them.
3. Increase the base compensation rate.
4. Provide for more frequent compensation reviews.
5. Remove the cap on adders

Additionally, the language needs to clarify and improve land use and siting criteria, performance standards and greenfield subtractors. As written, the current regulations lack sufficient clarity and specificity regarding land use performance standards for ground-mounted projects. In general, performance standards must be defined in such a way as to not unreasonably hinder the development of ground-mounted projects for low income and affordable housing. The SMART program should also give deference to cities and towns that have gone through the time and effort to identify and zone areas as appropriate for solar/power generation; projects in these areas should not be subject to a subtractor.

Thank you for your thoughtful consideration.

Respectfully,

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