

**Jane Roy Brown + Bill Regan
6 Parsons Road
Conway, MA 01341**

July 10, 2017

Joanne O. Morin
Deputy Commissioner
Energy Policy, Planning & Analysis
Commonwealth of Massachusetts

Dear Deputy Commissioner Morin,

I was concerned to learn about the proposed new SMART program in detail from my solar energy installer. Without the attractive incentive package (including a low-interest loan scaled to income) that made it possible for lower- and middle-income households to install solar panels and sell electricity back to the grid, my husband and I would not have participated in this clean, renewable form of energy. The panels were installed in April, and we are already realizing relief from our \$100+ monthly electric bills.

I am dismayed that SMART seems to cater to utility company interests. These companies have resisted modernizing in virtually every way possible, including restructuring for a more flexible, entrepreneurial marketplace. Solar technology is hardly new.

Why should consumers pay for the failure of utilities to adapt, especially as climate change adds pressing urgency for as many consumers as possible to adopt renewable energy? And why should the entrepreneurs who are pioneering ways to achieve efficient proliferation of renewable energy be punished for being nimble and innovative?

In particular, here is a list of points that I feel strongly should be included in a revision of the proposed SMART program to foster wider solar access:

- Consumers should continue to receive compensation for residential solar (<25kW) to allow systems to pay back in 10 years or less.
- These compensation levels should also remain consistent throughout the entire SMART program.
- The current 200 percent base capacity factor for residential solar (<25kW) needs to be revised to 300 percent.
- Why not also allow systems smaller than 25kW to be eligible for all adders? SMART program compensation levels are too low and decline too quickly to support a diverse range of projects throughout the program.
- Reviews of the SMART program progress should be completed at least every 6 months to adjust compensation levels to develop 1600 MW of solar PV by 2022.

- The urgency of climate change underscores the need to accelerate the development of low income- and community-shared solar so that 75 percent of the ratepayers in the Commonwealth have equal access to the benefits of solar PV distributed generation.
- To further expand access, SMART should remove the 320 MW cap on the availability of incentive adders. This introduces uncertainty and acts as an arbitrary barrier to project development.
- Incentive adders should not decline over time, because they are based on incremental costs that are not reasonably expected to decline over time.
- Everyone in the state should be using renewable energy by 2050, latest. (Boston's waterfront is already sinking, after all.) But the current SMART program is not going to get us there fast enough: By block 8, in 2022, we are scheduled to have only 3200 MW (3.2 GW) of our electrical demand provided by solar PV. That means only 8 percent of our electrical demand will be provided by solar PV. *That is not enough.* We need to move much faster than that to meet Global Warming Solutions Act goals or to try to mitigate all the carbon already released.

Deputy Commissioner, in earlier times we thought we could keep moving the deadline for change. We were wrong, which is why we find the tide rising and our ecosystems in collapse. We need to move immediately to achieve maximum public good, if not our very survival.

Thank you for your attention and for your service.

Sincerely,

Jane Roy Brown