

Comments of Brent Voelker at 225 CMR 20.00: SOLAR MASSACHUSETTS RENEWABLE TARGET (SMART) PROGRAM public hearing held at Westfield State University on July 10, 2017:

My name is Brent Voelker. I am the director of Kinsley Energy Systems, a wholly-owned subsidiary of the Kinsley Group incorporated in the state of Connecticut but with deep roots in Springfield, MA. The Kinsley Group includes Kinsley Power Systems, a Kohler Power Systems standby generator distributor and provider of standby generator service to customers throughout New England, New York, New Jersey, and Pennsylvania. We have an extensive base of Commercial and Industrial customers throughout the state of Massachusetts, many with loads from 100kW to 1MW. Our customers tend to be entrepreneurial, independent, and keenly interested in improving the efficiency and effectiveness of their operations.

Kinsley Energy Systems is a provider of highly-efficient distributed energy solutions, including cogeneration, energy storage, efficient natural gas-engine generators, and microgrid controls. We work with solar providers to optimize behind-the-meter prime-power distributed energy systems for our customers. We routinely hear from our customers that, however much they value renewable energy and carbon reduction, their first priority is invest in improvements to their operations, enabling them to expand their businesses, create new jobs, and increase employee compensation and satisfaction. They do not choose to invest in solar power simply for its own sake, but to exercise greater control over their energy production and consumption, to become better and more effective stewards of their resources and more responsible and independent prosumers of electric power.

As we promote the use of solar, storage, and other distributed generation resources, however, we have encountered confusion in the marketplace as to which party – asset owner or utility – would be granted authority to control behind-the-meter assets enrolled in the SMART program. Some of our customers have been led to believe that the utility would exercise the right of “ownership of the electrons,” treating the installation for billing purposes as a front-of-the-meter installation. Under such an arrangement, the owner would not receive credit for peak demand management or time-of-use shifting, but would be billed for their power usage, including demand and ICAP charges, based on total rather than net consumption. Such control by the utility over the distributed energy resources that absorb precious real estate with no direct benefit to the operation would be untenable to many of our customers and would likely discourage otherwise energy- and socially-conscious businesses from making important investments in renewable energy.

We therefore request that the DOER, to the extent they possess appropriate legal authority, clarify within the text of 225 CMR 20.00 that the right to dispatch distributed generating assets shall accrue to the equipment owner, and that such owner shall be free to operate those assets in the best interest of their business to manage peak demand, time-shift renewable energy, and participate in ancillary services and demand response programs at will.

Thank you very much for your attention to this issue and for your important work to promote renewable energy investment within the state of Massachusetts.

Sincerely,
Brent Voelker
Director, Sales

Kinsley Energy Systems
14 Connecticut South Drive
East Granby, CT 06026
860.844.2212 direct 860.844.6136 fax
860.830.2622 cell
www.kinsley-group.com

