



June 27, 2017

TO: Massachusetts Department of Energy Resources
RE: Production metering in Solar Massachusetts Renewable Target (SMART) Program Design

On behalf of PowerDash, I am writing to provide input on the metering provisions referenced in the 1/31/2017 SMART program design document (<http://www.mass.gov/eea/docs/doer/rps-aps/final-program-design-1-31-17.pdf>). Our company, as both an independent verifier for Class I RECs and as an auto-reporter for the MassCEC Production Tracking System, has extensive experience in serving commercial and residential solar monitoring and incentive reporting needs in the Commonwealth.

On page 37 of the SMART program design document, there are some guidelines regarding metering:

- Two separate meters
 - Utility customer meter
 - Production meter
- Distribution company will own production meter and will report both production and utility meter data to program administrator on a monthly basis
- Technical requirements for meters still need to be refined, but would likely mirror existing standards
- Process will be established to ensure that production meter data can be accessed by the system owner
- System owner may own redundant production meter if they choose to do so
- Data Acquisition System (DAS) may be required for all systems

Based on our experience with different owner/manufacture situations, we recommend against the distribution company owning both the production meter and the utility net meter. Here are reasons:

1. A production meter is typically required for a variety of needs independent of the utility/distribution company's needs. For example, many financing arrangements such as leasing and Power Purchase Agreements require independent, revenue-grade production metering. If the utility/distribution company owns the production meter, that will either require a complex service relationship between the utility and the leasing/PPA provider or require the leasing/PPA provider to have redundant production metering and communications.
2. With the trend of having an ANSI C12 production meter integrated into inverter manufacturer offerings (such as Enphase Envoy-S Metered or Fronius ANSI C12 rated inverters), this proposed policy change of having the production meter be independent of the generation equipment is at odds with natural technology evolution in the marketplace. Having the production meter component as an integrated component is a cost-saving development, making solar more cost-effective and accessible generally.
3. With the increasing development of solar-plus-storage solutions, new service models may develop that would significantly alter the current relationships between solar system owners and distribution companies. In some of those scenarios, it may be cumbersome and perhaps a conflict of interest for a distribution company to serve as the primary production metering provider for the system owner.
4. For the above reasons, we believe there is still a compelling case for production metering by independent providers such as PowerDash. This independence helps to ensure trust and



transparency for all stakeholders in the context of the SMART program change and in the marketplace more generally.

5. If redundant production metering is required, that will increase the cost of solar for the leasing/PPA provider and ultimately for the system owner -- which is an increase to both fixed costs (meter) and recurring costs (connectivity/service since cellular is standard now).

If you would like to discuss any of these points, I would be happy to do so.

Sincerely,

A handwritten signature in black ink that reads "Stephen Lapointe".

Stephen Lapointe
President