



Rosemary Wessel, Founder/Director

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

RE: SMART solar incentive program

Dear Commissioner Judson:

Thank you for the opportunity to provide comments on the SMART solar incentives program. I am writing on behalf of No Fracked Gas in Mass, which advocates for clean energy solutions as a viable alternative to fossil fuel expansion here in the Northeast.

The SMART program, as currently written, fails to demonstrate a commitment to equity and runs a significant risk of limiting or even blocking access to solar in urban and low-income communities. These kinds of projects have a critical role to play in addressing energy affordability for families struggling to pay their electricity bills and affordable housing properties looking to stabilize utility costs by going solar. Unfortunately, the continued development of these projects under SMART would be in jeopardy. In addition, as key barriers to solar are not addressed in the regulations, access to these projects will remain limited if not become moreso.

The compensation levels under SMART are too low and the mechanism for sharing savings from solar has not been established, essentially cutting off any benefit for low income communities. Under SMART, the cuts in compensation are too steep, preventing solar from stabilizing electricity bills and saving people money – key goals that make solar accessible for all income levels. Targeting private affordable housing solar projects by cutting total compensation at least 46%, as compared to SREC II and full retail net metering is particularly unfair. Even under the higher compensation levels available under SREC II, no new projects have come online. SMART compensation rates will continue to leave these types of solar development out of reach.

Allowing solar bill credits to be shared with any electricity account across the state is not available under the current net metering framework and is a major barrier to solar for urban and low income residents in and around Boston, where sites for shared solar projects are extremely limited. SMART could seize the opportunity to offer the potential to expand access to solar energy all across Massachusetts including across income levels, but fails to mention any such provisions, with no detail whatsoever on how the crediting mechanism will be administered.

Also, Municipal Light Plants and their customers are excluded from the SMART program because of the tariff-based nature of the program. MLPs deliver 13% of the electricity in the state. DOER and the legislature should promptly create a partner program to SMART so that these communities are not left out and so all residents of Massachusetts can enjoy the benefits of solar energy.

To address these issues, DOER should do all of the following to ensure equitable access to SMART for low income communities and residents, and customers of Municipal Light Plants:

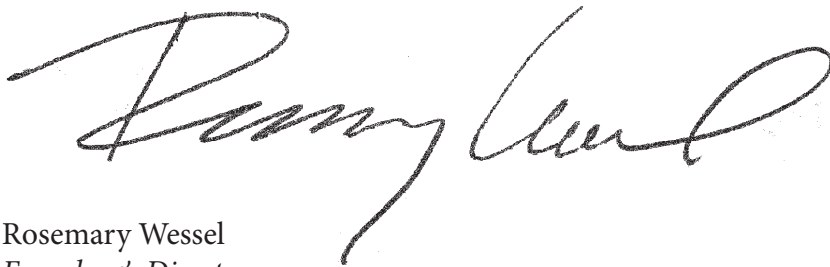
DOER should do at least the following before finalizing the SMART regulations:

- 1. Increase compensation for all categories of low-income and community shared solar projects and slow the rate of compensation decline;**
- 2. Remove adder caps;**
- 3. Fix adder values so they do not decline throughout the program; and**
- 4. Issue guidelines or a straw proposal for the Alternative On-Bill Credit Mechanism that includes the elements needed to ensure expanded access to solar for low-income communities.**

Taking these changes into account, the SMART program has the potential to make solar available to low-income communities and residents, for affordable housing to lower utility costs and volatility by accessing solar; and for solar to help families struggling to pay their electricity bills.

Thank you for considering my comments.

Regards,

A handwritten signature in black ink, appearing to read "Rosemary Wessel". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Rosemary Wessel
Founder & Director
No Fracked Gas in Mass