

DOER SMART program comment

Rand Barthel, 2017-07-11

Dear DOER:

The new proposed policy on compensation for solar electricity producers in Massachusetts, abbreviated SMART, is an important part of the state's effort to create policies to insure that Massachusetts complies with the Global Warming Solutions Act of 2008 (GWSA). It is important to remember that GWSA is not just an inconvenient law that has to be complied with until government agencies and utilities can figure out a way to get around it: GWSA represents Massachusetts' fair share of what the whole world must do to head off climate catastrophe. Therefore, when evaluating SMART, the question we must ask is "Will SMART drive continued aggressive deployment of renewable energy for years to come, leading to a transformation of Massachusetts' energy sources to a green, low-carbon portfolio?" The 1.6 GW of solar envisioned under this policy is a milestone, not an endpoint.

I am concerned that the declining compensation levels under SMART may cause solar incentives to be insufficient in the future, and may have a demoralizing effect on this thriving industry now. I am also concerned that the policy may not provide adequately for low-income people and communities to benefit from solar energy. Over time, that could create a political problem where solar comes to be seen as an "elite" form of energy available only to the affluent. We need to make sure that it is possible for people of modest means to "subscribe" to solar energy that may be sourced from outside their home utility's service area. It is not clear to me that SMART will do this as currently proposed.

We have to remember that the two biggest electricity utilities in the state, Eversource and National Grid, are also gas utilities and have a bias in favor of natural gas as a solution for electricity generation. They would opt for new gas pipelines and more gas-fired power plants if given the option, even if that would make it mathematically impossible to comply with GWSA. Their political influence must be resisted, ad DOER and throughout state government. Utilities have to be able to make a reasonable profit while operating our electricity grid, but their profitability is ultimately less important than whether we meet vital climate goals. We should be changing the way utilities are regulated to correct the incentives that currently cause them to prefer fossil fuel solutions.

Thank you for your attention!

Rand Barthel

Mendon MA