

Dear Commissioner Judson,

Thank you for your work to maintain Massachusetts's leadership in solar PV installations and incentives that support the expanded development of solar.

I am writing to ask that you revise the current iteration of the Solar Massachusetts Renewable Target (SMART) program before finalizing it. Solar expansion is critical to the growth of the Massachusetts economy and to keeping our environment clean and safe for our families and future generations. The SMART program should be strengthened by:

- \* **Setting the incentives at a level that will support accelerated solar development and protect and expand solar jobs in the Commonwealth.**
- \* **For residential solar (under 25kW)**, setting incentives to allow for a payback of 10 years or less to make it attractive to homeowners. The base capacity factor for residential solar should be increased from 200% to 300%. Residential systems should be eligible for all adders.
- \* **Allowing the competitive process to set incentive levels with a higher ceiling to ensure that the entire program will work in the years to come.**
- \* **Protecting additional support in the form of adders for community solar, low-income solar and other priority solar development from decline over time, to ensure ongoing and accelerated growth of these types of projects and equal access to solar regardless of income levels.** This is especially important as low-income residents pay a higher percentage of their income for utilities. Access to solar would decrease their electric bills, freeing up income to pay for other essential expenses which contribute to our economy.
- \* **Removing the caps on the adders**, so that community solar, low-income solar and solar with storage are encouraged as much as possible. **DOER should remove both the cap on the total capacity of projects that can qualify for these adders and the cap on total adders any given project can use.** The 320 MW cap on adders introduces uncertainty and places an arbitrary barrier to solar development.
- \* **Removing from the proposal all declines in adders over time** that are based on the unreasonable expectation of parallel declines in solar costs.
- \* **Adding an adder to incentivize west and southwest facing PV installations to help shave our increasing late summer afternoon peak loads and to reduce the need for expensive and more polluting power and pricy energy storage to address these peaks.**
- \* **Reviewing the SMART program every 6 months to adjust compensation levels to ensure the development of 1600 MW of solar by 2022.**
- \* **Encouraging the continued use of solar net metering to fairly compensate solar customers for their valuable solar power.** The SMART program has not proposed any adequate replacement for net metering and will not be successful without the continued existence

of fair and full compensation for solar customers in the Commonwealth. **DOER should work with the legislature to raise or eliminate net metering caps immediately.**

**\* Supporting a plan by the Commonwealth that will allow us to meet the greenhouse gas emissions goals set by the Global Warming Solutions Act and to move quickly beyond that to 100% renewables by 2050 or sooner. Our world and we in Massachusetts depend on it!**

I appreciate the opportunity to comment on the proposed SMART program and request that you make these much needed improvements to the final program design.

Please confirm receipt of these comments.

Sincerely,

“Sally” Sarah Pick

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Empowering homeowners with the information and resources they need to: explore and prioritize energy saving and renewable energy options; reduce wasted energy; make their homes less drafty, more cozy, and healthier; lower their carbon emissions; and find incentives, financing and qualified energy contractors to bring their energy projects to fruition.

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"Energy efficiency is an investment...The cheapest kilowatt is one you don't have to buy."  
~Paul Scheckel, The Home Energy Diet  
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