

July 11, 2017

Judith Judson, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street 10th Floor
Boston, MA 02116

Re: Solar Massachusetts Renewable Target (SMART), 225 CMR 20.00

Dear Commissioner Judson:

Thank you and all your staff for the work to draft the emergency regs.

For the residential <25kW sector, the compensation at 200% factor, 10 yr term, receives exactly the same total monetary value as a 1MW array at 100% factor, 20 yr term. The per watt cost of the 1MW array is about half of the residential <25kW system. So the residential system costs are not compensated at the same rate as the larger systems. Need to increase the factor to 300% or 400%.

All of the easy one story ranch house roofs are gone. 50% of our projects are pole or tracker installs which cost much more than \$3.5/W. This sector will need the simple payback to be less than 10 yrs for them to move forward. 300% will barely enable the math to work out for the first block. Starting at 400% gives the ratepayers an opportunity to participate in all 8 blocks.

200% is a burden on the ratepayers who step up to contribute their own capital, assume the risks and bear the vagaries of the marketplace.

200% a burden on the small distributed solar PV systems and their ability to contribute to the distributed generation we need to ensure grid reliability, stability and sustainability.

1. No cap on adders. This is a complexity which is unnecessary and capricious.
2. No declining values of adders as the costs are not all market driven and certainly not all are going down.
3. Review every 6 months progress of blocks and adders being allocated. Need to be able to respond to market pressures such as the Suniva tariff, loss of the ITC, and other events unknown at this time.
4. Value low income and community solar so that they work for those segments. Up to 75% of the ratepayers are not able to directly site solar PV due to a number of reasons. Community shared solar is their only opportunity to participate in the distributed energy revolution.
5. Increase block sizes to 400MW each. We need more, much more Solar PV generation to meet the GWSA, to reduce GHG emissions faster, to cover increases in electrical demand from EV and heat pumps.
6. Allow residential <25kW systems access to ALL adders. We would like to include low income and Community shared solar projects in this sector. As well as canopies and other adders.

Thank you for your attention,

Claire Chang
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