

Much of the SMART program will help continue solar growth. However, some aspects of the program could use improvement. Overall, there needs to be a greater commitment to equity in the program. If not addressed, there would be fewer opportunities in community shared and low-income solar projects, further limiting access to solar for renters, low-income households and those who do not own a sunny rooftop. Solar needs to be for ALL. The sun is available for all, solar should be, too.

Please improve these flaws:

- * SMART program compensation levels could be not be high enough to encourage greater participation and they could reduce too quickly to support a wide range of projects throughout the program.
- * The 320 MW cap on the availability of incentive adders (e.g., 2 cents per kWh for building mounted projects) creates an arbitrary barrier to project development and creates a sense of scarcity, disincentivizing participation. Adders should be available for the duration of the program, without a cap.
- * Incentive adders should maintain their value and not be reduced over time, because they are based on fairly stable incremental costs.
- * The draft regulation fails to specify a new on-bill crediting mechanism that could reasonably serve as an alternative to net metering credit allocation.

If we are to successfully provide the benefits of solar (reduced energy consumption costs, a non-fossil fuel source, and climate mitigation), Massachusetts must make a commitment to support regulations that make it available for ALL, including the citizens for whom it would otherwise be inaccessible.

Thank you for taking my comments.

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