



Chase Systems LLC

Renewable Energy Development and Consulting

July 11, 2017

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

Re: Comment Letter SMART Program

Dear Commissioner Judson:

We appreciate the efforts which DOER has made to include input from stakeholders in development of the new SMART program. The new program will continue the development of more Massachusetts based renewable energy and the local jobs and investment. There are several items which should be addressed to make the program more effective.

Chase Systems is a commercial and utility scale solar consulting firm focused on building and ground mount systems.

First: the capacity allocated in this program 1600 MW and related net metering caps should be raised together in line with the other requirements to meet the goals for renewable energy in the Global Warming Solutions act smoothly with no gaps or delays in program availability.

Second: Conflict of clauses

225 CMR

20.05: Tariff Based Incentive Program for Solar Photovoltaic Generation Units

(5) General Eligibility Criteria for Solar Tariff Generation Units

5. Performance Standards:

- b. ballasts or screw type pilings that do not require footings or other permanent penetration of soils for mounting are required;
- d. no concrete or asphalt in the mounting area;

These clauses are in direct conflict.

- “b” “ballasts” are customarily concrete, which specifically excluded in clause “d”.
- Concrete is customarily used in the mounting area for mounting of central inverters and transformers per code. While the use of concrete should be minimized and will be for cost reasons, it must not be prohibited.

Please strike out clause concrete from “d”.

Sincerely:

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