

July 10, 2017

To DOER,

Re: SMART Program

These are some of our comments regarding the SMART Program:

We want compensation for residential solar(<25kW) to allow systems to pay back in 10 yrs. or less and these compensation levels throughout the entire SMART program. The current 200% base capacity factor for residential solar (<25kW) needs to be revised to 300%.

Additionally, allow systems smaller than 25kW to be eligible for all adders. SMART program compensation levels are too low and decline too quickly to support a diverse range of projects throughout the program.

We want reviews of the SMART program progress every 6 months to adjust compensation levels to develop 1600MW of solar PV by 2022.

We want to accelerate the development of low income and community shared solar so that 75% of the ratepayers in the Commonwealth have equal access to the benefits of solar PV distributed generation.

We want removal of the 320 MW cap on the availability of incentive adders that introduces uncertainty and acts as an arbitrary barrier to project development.

We want incentive adders to not decline over time, because they are based on incremental costs that are not reasonably expected to decline over time.

We want 100% renewable energy for all in the Commonwealth at least by 2050 if not sooner. SMART is not going to get us there fast enough. By block 8 of the SMART program, in 2022, we are only scheduled to have 3200MW (3.2GW) of our electrical demand provided by solar PV. That means only 8% of our electrical demand provided by solar PV. That is not enough. We need to move much faster than that to meet Global Warming Solutions Act goals or to try to mitigate all the carbon already released.

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