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July 11, 2017

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

RE: Solar Massachusetts Renewable Target (SMART) program

Dear Commissioner Judson,

Thank you for the opportunity to provide comments on the Solar Massachusetts Renewable Target ("SMART") program. I am writing on behalf of the Environment Massachusetts Research & Policy Center, a nonprofit organization dedicated to protecting Massachusetts' air, water and open spaces. We investigate problems, craft solutions, educate the public and decision-makers, and help Bay Staters make their voices heard in local, state and national debates over the quality of our environment and our lives.

We appreciate the efforts of staff from the Department of Energy Resources (DOER) to develop this program and solicit input from a broad range of stakeholders. Unfortunately, the SMART program as currently proposed falls short of the DOER's stated objectives to "maintain robust growth across installation sectors" and "ensure widespread access to incentives for all ratepayers."

We are concerned that the incentives may be too low to support continued solar development, particularly for low-income and community shared solar projects, and may decline too quickly relative to the actual decrease in solar installation costs. While we appreciate the inclusion of adders for desired categories of solar projects, such as rooftop and low-income, we are concerned about the arbitrary 320-megawatt limits for each type of adder. These limits could create additional uncertainty for families, businesses, and institutions that want to switch to solar, and put solar out of reach once a particular adder is exhausted.

Rather than placing a limit on the amount of solar eligible for the low-income adder, DOER should consider a carve-out that would guarantee that a minimum amount of solar installed under the SMART program would benefit low-income communities. Additionally, DOER should work to address the fact that residents of communities served by municipal light plants are not eligible for incentives under SMART.

The Alternative On-Bill Credit Mechanism (AOBCM) could serve to expand access to solar energy, but the draft SMART regulations are lacking in detail about how the program will be designed and administered. While the Department of Public Utilities (DPU) ultimately has jurisdiction over the tariff, we encourage DOER to provide more guidance to ensure that the AOBCM supports all categories of solar projects, including low-income and community shared solar.

Finally, we urge DOER to think bigger in plotting the next stage of Massachusetts' solar development. Earlier this year, Massachusetts reached 1,600 megawatts of solar installed, three years ahead of the 2020 goal. Hitting our 2020 solar target in 2017 should be a reason to set our sights even higher. It shouldn't be an excuse for resting on our laurels.

The SMART program as currently proposed covers only the next 1,600 megawatts of solar development, but our recent progress should make us optimistic that we can go much further. Massachusetts deserves a solar program that puts us on a fast track to 100 percent renewable energy. Our climate and our health can't wait.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Hellerstein', with a long horizontal flourish extending to the right.

Ben Hellerstein  
State Director  
Environment Massachusetts Research & Policy Center