



July 7, 2017

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

RE: SMART solar incentive program

Dear Commissioner Judson:

Thank you for the opportunity to provide comments on the SMART solar incentives program (SMART). The following comments are from the Berkshire Environmental Action Team, Inc. (BEAT). BEAT is a nonprofit organization with a mission to work with the community to protect the environment for wildlife in support of the natural world that sustains us all. Transitioning our economy to one that runs on clean energy will provide cleaner air, water, and land to protect people as well as wildlife.

Right now, the Commonwealth of Massachusetts has an opportunity to improve access to solar, but in its current form, the SMART program does not appear to demonstrate a commitment to equity and runs a real risk of curbing access to solar in urban and low-to-middle income communities.

In addition, the SMART program appears to allow the utilities to move away from a system that supports distributed smart energy systems. The utilities will have to grapple with major changes to how our electric grid operates. This program appears to be hoping to go back to the dark ages of a few big fossil fuel plants fouling our air, water, and land while the distribution companies just keep everyone connected to these greenhouse gas emitters. That is not the future we want to see.

We are looking for Non-Wire Alternatives that decrease environmental impacts while increasing reliability and providing local power.

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Non-Wires Alternatives

From Navigant Research downloaded 7/7/17 from

<https://www.navigantresearch.com/research/non-wires-alternatives>

**Non-Traditional Transmission and Distribution Solutions:
Market Drivers and Barriers, Business Models, and Global Market Forecasts**

Traditionally, when a transmission or distribution system operator needed to upgrade or replace infrastructure due to aging equipment or increased load demand, it would simply conduct poles and wires projects. However, grid management and distributed energy resources (DER) technologies have improved, utilities are looking to engage customers more, and policy concerns related to cost and the environment have grown. In reaction, more creative solutions are being explored to address infrastructure needs at a lower cost with greater customer and environmental benefits. These types of projects are known as non-wires alternatives (NWAs).

If the distribution utilities feel threatened by “grid defection”, the state should encourage them to add incentives for customers to stay connected to the grid, rather than to allow these utilities – whose CEO's take home millions of dollars each year – to punish those who use less grid-electricity.

The mandatory minimums for electric bills harm both those who do their best to reduce electricity use, as well as those who have solar installed, not to mention those least able to afford electricity. Please do not raise the minimums for electric bills. If anything, these fees should be lowered.

The Department of Energy Resources (DOER) should create an “equity carveout” for projects that benefit disadvantaged communities, similar to the 20% set-aside DOER has proposed for projects under 25 kW. Addressing key complexities and barriers may require significant work from entities other than DOER and DPU as well, and will require the passage of new legislation to eliminate, or, at the very least, raise the net metering caps and address other issues.

Massachusetts should analyze and quantify the value of distributed energy resources, such as solar, to the grid, so that consumers can be compensated more accurately going forward. The analysis should examine the benefits of 1) transactional or time-of-use pricing, 2) using local energy resources to avoid expensive investments in more poles and wires for transmission and distribution, and 3) offering incentives to make clean distributed generation more accessible to all customers including low- and moderate-income customers.

Municipal Light Plants (MLPs) have been established in 41 communities across the Commonwealth. They serve all or part of 50 municipalities and deliver 13% of the

electricity in the state. DOER and the legislature should promptly create a partner program to SMART so that these communities are not left out and so all residents of Massachusetts can enjoy the benefits of solar energy.

In the long run, Massachusetts should be moving toward a transactional energy system where the price of electricity is set by buyers and sellers on a device basis. When demand system-wide is high, the price for electricity would be higher, and more devices would choose to wait for the price to go down, thus flattening the energy curve. This way, we will have far less wasted capacity and a far more efficient and resilient system.

Thank you for considering our comments.

Sincerely,



Jane Winn
Executive Director