

Comments on Solar Massachusetts Renewable Target (SMART)

July 11, 2017

Commissioner Judith Judson
Massachusetts Department of Energy Resources
100 Cambridge St., Suite 1020
Boston, MA 02114

Dear Commissioner Judson:

I wish to express my strong concern with the Solar Massachusetts Renewable Target (SMART) program as currently envisioned. Although the SMART program may work for some categories of projects, it has serious flaws that jeopardize the future investment in solar that Massachusetts needs and deserves.

In particular, the SMART program fails to demonstrate a real commitment to equity. The program design issues highlighted in this document will create new barriers that greatly endanger the development of 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. In some regions of the state, recent net metering cuts and uncertainty due to net metering caps have already stalled community solar development, halting any progress being made to equitably distribute the benefits of solar programs.

Continued solar growth is critical to the Massachusetts economy and keeping our environment clean and safe for our families and future generations.

I consider the following critical improvements essential in any resulting final regulations and tariffs:

The SMART program must:

1. *Set the base compensation rates at a level that will encourage continued solar development and protect solar jobs in the Commonwealth.* The competitive process to set these levels should be allowed a higher ceiling, \$0.175 per kilowatt-hour, to insure the entire program will work in the years to come. At the same time, additional support (adders) for community solar, low-income solar and other priority development should be protected from decline over time to ensure continued and accelerated growth of these types of projects given their relatively stable additional cost.
2. *Remove the hard caps on the proposed adders, so that community solar, low-income solar and solar with storage are encouraged as much as possible.* Caps on the total capacity of projects that can qualify for these adders, proposed at 320 megawatts, conflict with the purpose of the legislation in promoting these important projects. The caps and decline

in adder value should be eliminated, or modified to initiate a more gradual decline in adder value instead of a sharp cliff.

3. *Encourage the continued use of solar net metering to fairly compensate solar customers for their valuable solar power.* The SMART program has not proposed an adequate replacement for net metering and will not be successful without the continued existence of fair and full compensation for solar customers in the Commonwealth. DOER needs to take action to ensure that the proposal for an alternative on-bill crediting mechanism can become a workable, complementary option for community shared and low-income solar projects. There needs to be an open, transparent process into the development of this mechanism before it is proposed to the Department of Public Utilities. In parallel, DOER should work with the legislature to raise net metering caps immediately.
4. *Clarify and improve new land use and siting criteria, performance standards and greenfield subtractors.* As written, the current regulations lack sufficient clarity and specificity regarding land use performance standards for ground-mounted projects. In general, performance standards must be defined in such a way as to not unreasonably hinder the development of ground-mounted projects. The SMART program should also give deference to cities and towns that have gone through the time and effort to identify and zone areas as appropriate for solar/power generation, and projects in these areas should not be subject to a subtractor.
5. *Ensure total compensation for residential systems is adequate to support continued sustainable development.* We are concerned that compensation for the under-25 kW and residential market segment is inadequate. This is due to the shorter, 10-year term for these projects and the differing economics of residential solar systems. To ensure that residential project can work for customers' needs throughout the SMART program, DOER should raise the under-25 kW compensation to 250% of the base rate and the Low-Income under-25 kW factor to 300% as well as expanding their ability to receive adders.

I appreciate the opportunity to weigh in on the new SMART program and strongly recommend that you make these much-needed changes. Massachusetts' continued solar leadership demands nothing less!

Sincerely,

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