

July 10, 2017

To DOER

Re: Comments on the new "SMART" incentive in MA.

I believe that changes you want to make to SMART in its current form are a mistake and will undermine the development of solar energy in Massachusetts. Residential solar owners should not have to wait 10 or more years for payback on your solar PV system costs. The need is to expand solar not undermine its development. We don't need more complexity in regulations and compensation levels. It is unacceptable to limit access to community shared or low income solar. The development of solar should not be slowed; in fact it should be accelerated. Why eliminate much needed solar jobs in MA or slow expansion of renewable energy?

I want compensation to remain in place for residential solar(<25kW) to allow systems to pay back in 10 yrs. or less and that I want these compensation levels throughout the entire SMART program. In fact 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. The SMART program progress should be reviewed every 6 months to adjust compensation levels to develop 1600MW of solar PV by 2022.

I believe you need 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. This is an issue of equity and social justice. SMART should remove the 320 MW cap on the availability of incentive adders that introduces uncertainty and acts as an arbitrary barrier to project development. Incentive adders should not decline over time, because they are based on incremental costs that are not reasonably expected to decline over time.

I want Massachusetts to set a precedent citizens can be proud of. I 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. We need to move much faster to meet Global Warming Solutions Act goals or to try to mitigate all the carbon already released.

Sincerely,

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