

July 10, 2017

Commissioner Judith Judson
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02116

Dear Commissioner Judson,

We are a concerned Massachusetts landowner. Please accept these suggestions in response to the emergency regulations on the Solar Massachusetts Renewable Target (SMART) program.

1. Set the base compensation rates at a higher ceiling, e.g. \$0.175 per kilowatt-hour and provide additional support for community solar, low-income solar and other priority development.
2. Remove the hard caps on these adders or modify them to initiate a more gradual decline in value.
3. Encourage the continued use of solar net metering to fairly compensate solar customers for their valuable solar power and raise the net metering caps.
4. Clarify and improve new land use and siting criteria, performance standards, special provisions and greenfield subtractors. The SMART program should 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 that total compensation for residential systems is adequate to support continued sustainable development, e.g. raise the under-25 kW compensation to 250% of the base rate and the Low-Income under-25 kW factor to 300% and expand their ability to receive adders.

Sincerely,

Gene & Sue Pettinelli
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