



July 11, 2017

Michael Judge, Director of Renewable and Alternative Energy
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020,
Boston, MA 02114

Comments on 225 CMR 20:00 SMART Program

Dear Mr. Judge,

Independence Solar appreciates the opportunity to be able to submit the following comments:

1. **What is Plan if One-Time Procurement Auction Fails for the 1-2 MW Category?** The entire viability of the remainder of the SMART program is based on the results of the 1-2 MW projects that apply for the One-Time Procurement. What if only a small handful 1-2 MW projects actually participate? That would certainly not constitute a market based result to set the rest of the programs rates upon. This, potentially very likely scenario, could either 1) set rates well too low to make SMART viable or 2) significantly delay the program timing if this creates delays in rolling out the rest of the program. Either scenario would have a hugely negative impact on the solar industry in the Commonwealth and the jobs that depend on it. The Department should have a plan in place to quickly roll out SMART along its original intentions and rate targets should the One-Time Procurement fail to yield market based results.
2. **Calculation of Compensation for BTM Systems** should = Base Rate + Adders – Greenfield – 3 yr average of Basic Service – Current utility tariff kWh delivery charges (distribution/transmission/transition). It makes no sense to go back 3 years on the customer's utility delivery tariff rates. Those tariff rates are set by the DPU and don't fluctuate due to market forces like Basic Service. Previous tariff rates within the past 3 years have no relevance to future customer savings if the customer's tariff rate has changed within past 3 years. This can be particularly punitive for BTM systems as many utility tariff rates have gone from a mix of kWh and demand charges to mainly demand within the past few years. For many smaller BTM systems setting up as a Stand Alone system is not an option as the cost of setting up a new stand alone utility service for a small generator is often cost prohibitive.
3. **Remove Adder Caps of 320 MW.** An explicit objective of the SMART program was to encourage "smart" land use of previously developed sites. This adder cap will reduce the amount of total Building and Canopy mounted systems developed under the SMART program by removing the Adder for those categories once an arbitrary level has been met. This seems to fly in the face of one of the main objectives of SMART.
4. **Clarify Land Acreage is Just Module Footprint.** Please clarify that for the purposes of 225 CMR 20.07(4)(f), the acreage of land that a Solar Tariff Generation Unit occupies shall be determined by calculating the square footage occupied by the solar photovoltaic modules (only, excluding any row to row spacing or buffer area) that are part of the Solar Tariff Generation Unit.
5. **Explicitly include Canopy STGU in Category 1 Non-Agricultural.**

Independence Solar would like to thank the Department for its consideration of our comments.

Sincerely,

James Schwartz
Vice President
Independence Solar, LLC