

July 10, 2017

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

RE: SMART COMMENTS

Dear Commissioner Judson:

Thank you for the opportunity to provide comments on the Solar Massachusetts Renewable Target (SMART) Program and regulation, 225 CMR 20.00.

Governor Baker's SMART program is admirable in its goal to nearly double the Commonwealth's solar. And there are many good aspects to the program, but some key improvements must be made to continue solar growth. These improvements are especially important to allowing low-income and other underserved communities to continue to directly participate and benefit from our solar economy. I am writing to express my concern with aspects of the program that will set us back on solar and not fully support the progress we have made here in Massachusetts nor sufficiently support the growth of the clean-energy solar industry that is within our reach and that is necessary to address climate change.

I believe that any solar program we institute in Massachusetts needs to remove obstacles to industry growth, and make available, fairly and equitably, clean, renewable energy to all residents and businesses in our state. Energy should be affordable and available to *all* residents – whether they are able to put solar on their rooftops or not. This includes, of course, individuals living in low-income apartments and public housing properties, or having landlords who are not motivated to put solar on their rooftops.

Here are the key objections I have to the SMART program – and I hope it will be rewritten to address these concerns:

- There are no clear regulations for clarifying and improving new land use and siting criteria. I am opposed to cutting down forests and destroying important natural areas to site solar arrays!! I would like to see regulations that address the problem of deforestation in the name of renewable energy use and especially outside solar developers encouraging landowners to switch their land use to solar in schemes that do not benefit the local community and that degrade the land.
- Compensation levels under SMART are too low and the mechanism for sharing savings from solar has not been established. The reductions in compensation are just too steep. No new projects have come on line since the new, lower net metering rates have gone into effect, and SMART compensation rates will be even lower and challenge the economic feasibility of these projects.
- SMART has the potential to expand access to solar across Massachusetts. Achieving this goal, however, requires a crediting mechanism that allows solar bill credits to be shared with any electricity account in the Commonwealth. This is not allowed under the current net metering framework and has served a major barrier to solar access for urban

and low income residents where sites for shared solar projects are extremely limited. The draft SMART regulations need to address this problem.

Experts recommend that DOER should do all of the following actions to address these issues, and I enthusiastically support them:

1. Increase compensation, fix adder values over the term of the program, and slow the rate of compensation decline for all categories of low-income and community shared solar projects to ensure they can provide savings and remain economically feasible.
2. Issue guidelines or a straw proposal for the Alternative On-Bill Credit Mechanism that includes the elements needed to ensure expanded access to shared solar for low-income communities and residents.
3. Expand the definition for "low-income customer". The current definition limits eligibility to the R-2 rate class, customers on the low-income discount rate. This leaves out many lower income renters as well as moderate-income customers that may struggle to pay their electricity bills. This definition should be expanded so these groups are included. One pathway for achieving this without extensive income-qualification programs would be to additionally incentivize solar projects in Environmental Justice communities.
4. Remove the cap on projects with adders.
5. *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.
6. With the above in place, DOER should also create a set aside within the SMART program for low-income community shared solar projects, as there is for small residential rooftop systems.

Thank you for your consideration of these important issues and helping to create a more renewable and equitable future for the Commonwealth.

Sincerely,



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