

Dear DOER:

It is inconceivable to me that Massachusetts would really want to stymie the solar industry at this time, when it is one of the fastest growing industries in the state and country. The need for a total replacement of fossil fuel and nuclear based energy sources with renewables is understood and agreed upon by scientists around the world. Economies in many states are buoyed by investment in renewable energy on the residential and commercial scale.

The SMART program as proposed will serve to dampen investment in solar energy. Below are some ways the program would need to be changed and improved to support continued growth in the solar industry in Massachusetts:

- compensation for residential solar(<25kW) should be sufficient to allow systems to pay back in 10 yrs. or less . These compensation levels should hold throughout the entire SMART program. 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.
- Targets with measurable results: Reviews of SMART program progress every 6 months to adjust compensation levels to develop 1600MW of solar PV by 2022.
- 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.
- 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.

A responsible target for the state of Massachusetts is to achieve 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. By block 8 of the SMART program, in 2022, we are only scheduled to have 3200MW (3.2GW) of our electrical demand provided by solar PV. That means only 8% of our electrical demand provided by solar PV. That is not enough. We need to move much faster than that to meet Global Warming Solutions Act goals, and to try to mitigate all the carbon already released.

Our lives, our children's lives, and the lives of people who live far from here on low-lying shores or islands depend on what we decide, how much responsibility we choose to take.

I choose to take as much as possible to mitigate the costly and deadly effects of climate change. Our state has and must continue to show leadership in this arena.

Thank you,

Sally Shaw  
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