

July 11, 2017

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

RE: SMART solar incentive program

Dear Commissioner Judson:

I am writing to you as an advocate for solar energy and for a just and fair society. I am deeply concerned that the SMART solar incentive program falls far short of its potential and further disadvantages those who are already marginalized.

Please consider the following changes:

1. SMART compensation levels for far too low, especially for private affordable housing solar projects. They need to have full retail net metering and rates similar to SREC II.
2. Solar bill crediting must be able to be shared with any electricity account in Massachusetts.
3. If we are serious about meeting the goals of the Global Warming Solutions Act of 2008, then the SMART program must remove caps on the availability of incentive adders.
4. Incentive adders should not decline over time.
5. Provide additional incentives for low income community shared solar projects.

As it currently stands, the SMART program seems to continue to contribute to Systematic Marginalization of Reduced-Income Taxpayers. With these proposed changes, the SMART program can better fulfill the goal of Solarizing Massachusetts for All Residents Together.

Thank you for helping to move SMART in a positive direction for all Massachusetts citizens.

Sincerely,

Saul Perlmutter, Rabbi
35 Meadow Street
Florence, MA 01062