

To: MA DOER

From: Ava Gips, Deerfield, MA

RE: SMART Program

Date: July 11, 2017

Please amend the SMART Program provisions so that:

1. Compensation for residential solar(<25kW) allows systems to pay back in 10 yrs. or less.
2. The current 200% base capacity factor for residential solar (<25kW) is revised to 300%.
3. Systems smaller than 25kW are 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.
4. Review the SMART program's progress occurs every 6 months to adjust compensation levels to develop 1600MW of solar PV by 2022.
5. The development of low income and community shared solar is accelerated so that 75% of the ratepayers in the Commonwealth have equal access to the benefits of solar PV distributed generation.
6. The 320 MW cap on the availability of incentive adders is removed. The cap introduces uncertainty and acts as an arbitrary barrier to project development.
7. Incentive adders should not decline over time, because they are based on incremental costs that are not reasonably expected to decline over time.
8. The goal becomes 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 or to try to mitigate all the carbon already released.