

SMART Stakeholder Questions

1. The SMART program currently provides added incentives for certain project types, including building mounted, canopy mounted, landfill, brownfield, agricultural, floating, community solar, and projects serving low income or public entities, projects with energy storage, and axis tracking. DOER seeks additional feedback on changes or improvements that will advance achievement of the Commonwealth's 2050 GWSA mandates while balancing land use, equity, and economic considerations.

A. What project type incentive changes could improve program outcomes?

- Higher value smart revenue for residential
- Less incentive for large scale projects greater 500 kW AC
- Less incentive for third party ownership
- Increased subtractors to clear land for solar.
- Increase adder for roof mount.

B. Should other project types also be prioritized?

2. The current SMART program structure includes a declining block model. Is a structure with fewer blocks and a greater decline between blocks preferable to a greater number of blocks with a smaller decline between blocks? Are there any other modifications to the declining block model structure that could more effectively support solar development?

- Eliminate declining blocks.
- Recommend one large block.

3. Are any eligibility criteria in the SMART program a barrier to participation? What are they, and how would you address these barriers? How would you streamline these eligibility criteria?

4. Is the current SMART reservation period (excluding any blanket extensions) adequate given current development and construction timelines? If possible, please provide a representative project timeline inclusive of key project milestones, such as permitting, procurement, and interconnection, to help inform DOER's understanding of the development process and current project timelines.

- From our experience, the reservation period is adequate.

5. Are there any emerging technologies or project types that are not currently eligible for SMART that DOER should consider making eligible for the program? Please describe potential project applications, any suggestions for eligibility requirements, and what level of incentives if any would be needed spur project development of the project type.

6. Are program compliance requirements clear prior to program enrollment? What are the key challenges with satisfying the data and/or documentation requirements for various program compliance checks, such as compliance with the energy storage, low-income, or community solar requirements? Are there any modifications you would suggest to DOER's compliance processes, or alternative data/documentation you believe could satisfy the requirements?

- Simplify process from start to finish.
- Eliminate verification of compliance data for energy storage (15-minute interval data).
- Energy storage manufacturers should supply data.
 - a. DOER should work directly with manufacturers.
 - b. Manufacturers would need approved software and pipeline to get that information.
 - c. Tesla supplies data/Solar Edge does not supply data.

7. Are SMART application processes and requirements clear? Is communication between applicants, the Solar Program Administrator, and DOER clear and effective? Please describe any improvements you believe could be made to the SMART application process.

- Add an edit button to lower capacity to eliminate wait period. Currently, users must withdraw SMART and then get into a new block.
- Allow for systems over 25 kW to receive smart commitment prior to ISA. For example, upon signed contract or site control similar to residential.
 - a. Initial reservation period that would cover the time between application and ISA.
 - b. Average time between contract and ISA is currently 6+ months in territories that are not in CIP hold.

8. Are there solar canopy project types that currently fall outside the SMART program's definition of Solar Canopy that you believe should be eligible for the Canopy adder? Please provide example project types and describe their benefits.

9. Are there examples of dual use agrivoltaics policies in other jurisdictions that align with Massachusetts' solar and agricultural objectives? Please provide citations and summaries of those policies.

10. What modifications to SMART incentive payment calculations, as currently set forth in 225 CMR 20.08, if any, are needed? Please provide examples formulas or calculations for DOER review.

11. How could the program be designed to insulate projects and participants from unforeseen market circumstances that materially impact the value of the SMART program incentive? For example, global events impact supply chain and energy costs.

- Eliminate three-year average of electricity rate in current formula. One year of high electricity will impact SMART for multiple years.

12. What additional consumer protection measures or modifications to existing measures should the SMART program incorporate to ensure such protections are achieving their objectives, especially as they pertain to low-income customers?

- Installers should have to pass certification.

13. Are there any Commonwealth policies (e.g., renewable energy goals, land use priorities, housing policy) that you believe the SMART program inadvertently conflicts with? Please describe any potential modifications to SMART that would alleviate these conflicts.

- Set land clearing subcontractors enough to deter developers from taking market share from local small to mid-size solar companies.
- Not enough value to incentivize participation.
- The SMART program gives the utility access to more consumer data by allowing them to see what their solar array is producing. Utilities are charging customers the distributed solar charge on energy that is produced on site.

14. Is there any additional feedback you wish to provide to DOER?

- For increased participation, we can't have \$376.90 fee at little to no value per kWh. Not including additional labor for installing a new meter socket.
- The SMART program needs to establish long term certainty and value.
- Improve the ability to change system size without restarting the application timeline. Especially when AC capacity decreases.
- ESS Compliance is too cumbersome.
- More transparency; Better administration of SMART payments. Third party should audit Eversource SMART payment disbursements. For example, we have seen payments that have been missed and had to go back to Eversource for payment.