

Maddalena, Lesley (ENE)

From: Dana Goodman <dana@nec-solar.com>
Sent: Wednesday, January 3, 2024 5:36 PM
To: DOER SMART (ENE)
Cc: CBrown@seadvantage.com; TMichelman@seadvantage.com
Subject: SMART Review Comments - NEC Solar, local stakeholder

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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?

I think the list is actually pretty comprehensive. Obviously higher compensation rates for each adder will improve program participation. Building mounted arrays, canopy arrays and landfill or brownfield arrays should have higher \$ comps to incentivize preservation of wildspace, land and to minimize land clearing.

b. Should other project types also be prioritized?

Higher subsidies for low and middle income would be good. Lower income projects for sustainable housing should be a priority.

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?

Absolutely. This model is terrible, unethical and inequitable. It favors "first come first served" and does not spread available funds equally or equitably. It is deeply flawed and creates a community for solar in which certain people - early adopters - are overly compensated and then others get basically nothing. Timeline through the year should not determine how much your compensation rate is. That is wildly unfair. The same rates should be available to ALL SMART enrollees in any same category/adder tier for the full year until funds are dried up. We lose clients because of how unfair this is, especially when folks *know* their neighbor got a higher rate than they are eligible to receive. It's bonkers.

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?

The declining block structure is the biggest problem.

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.

The reservation period should be extended indefinitely "until installation is complete". It's not fair for a client to lose their SMART rate if a project is delayed due to unforeseen circumstances. Commercial projects can take literally 2-3 years to get permitted and installed. Residential clients can take anywhere from 3mo to 1 year if there are problems with supply chain or permitting. The local utilities can be extremely slow to permit or inspect.

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 to spur project development of the project type.

Unsure.

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?

Disclosure forms can always be easier, but I'm unsure as the back end paperwork is not my responsibility.

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.

Not in my job duties.

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.

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Not in my experience.

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.

Not in my experience.

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.

Unsure.

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.

Looking at ISO-NE predictions for future rate hikes & assuming that rates will escalate a *minimum* of 4% each year. Supply rates have nearly doubled in the last 10 years, so looking at how past rates have changed and building in % increases yoy will ensure SMART is relevant as the years continue.

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?

Unsure.

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.

Don't have enough time for detail on this.

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

Simply put SMART is inequitable, favors an elite few instead of benefitting all, and needs to be changed to be more fair and to distribute funds evenly throughout each utility territory.

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Sunny Salutations,

Dana Goodman



(she/they. just don't call me late for dessert...[why pronouns matter](#))

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