



Cape Light Compact JPE  
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January 23, 2024

Via email (DOER.SMART@mass.gov)

Department of Energy Resources  
Attn: Samantha Meserve, Renewable and Alternative Energy Division Director  
100 Cambridge Street, 9th Floor  
Boston, MA 02114

**RE: SMART Review Comments**

The towns of Aquinnah, Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Edgartown, Eastham, Falmouth, Harwich, Mashpee, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, West Tisbury, Wellfleet and Yarmouth, and Dukes County, organized and operating collectively as the Cape Light Compact JPE, a joint powers entity pursuant to G.L. c. 40, §4A ½ and G.L. c. 164, §134 (the “Compact”), submit these comments to the Department of Energy Resources (“DOER”) in regards to its request for feedback to evaluate potential amendments to the Solar Massachusetts Renewable Target (“SMART”) program (225 C.M.R. 20.00). The Compact is the municipal aggregator and energy efficiency program administrator on Cape Cod and Martha’s Vineyard.

The Compact comments on Question 3 regarding eligibility criteria being a barrier to participation in the SMART program, focusing on the eligibility criteria for qualifying as a Low Income Solar Tariff Generation Unit (“STGU”). Requiring that customers either be on the utility discount rate or live within a Low Income Eligible Area in order to qualify as a Low Income STGU is a potential barrier to income eligible customers receiving the higher compensation rate. As an energy efficiency Program Administrator, the Compact has extensive experience with income qualification. The Compact has learned that getting on the utility discount rate can be extremely challenging because customers often need to go through a Community Action Agency and are required to be on a means tested program (such as the Low Income Home Energy Assistance Program) in order to qualify. Demographics on Cape Cod and Martha’s Vineyard are unique in that customers may have assets (e.g., in the form of a house that has been passed down within a family), but that same customer may be retired and living on a fixed income. These customers are not eligible for LIHEAP but are earning less than 60% of state median income.

The Compact has observed an additional barrier to income eligible customers qualifying their PV systems as Low Income STGUs through its operation of a revolving grant program with nonprofit organizations, such as Habitat for Humanity, who install solar PV on low-income households. The Compact provides funding upfront to cover a portion of or the full cost of the PV system and then is compensated by receiving the SMART payments generated by the system over the term of its enrollment in the program. These funds can then be provided to future PV systems. Because of the way in which these systems are installed and enrolled in the SMART program, they have not been able to qualify as Low Income STGUs. At the time that the SMART application is submitted, the system owner is still

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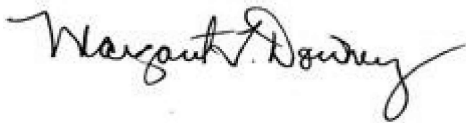
Aquinnah | Barnstable | Bourne | Brewster | Chatham | Chilmark | Dennis | Dukes County | Eastham | Edgartown | Falmouth  
Harwich | Mashpee | Oak Bluffs | Orleans | Provincetown | Sandwich | Tisbury | Truro | Wellfleet | West Tisbury | Yarmouth

Habitat for Humanity, as opposed to the person who will ultimately own the home. As such, the utility bill does not reflect the low-income discount rate. These homes are often not located in a qualifying Low Income Eligible Area, so they cannot meet either of the two eligibility criteria and are not able to take advantage of the higher, low-income compensation rate.

The Compact requests that DOER consider the barriers that income eligible customers face in meeting the eligibility criteria for a Low Income STGU as it undertakes its review of the SMART program to increase the number of income eligible customers who can take advantage of the higher compensation rate.

The Compact appreciates the opportunity to provide feedback.

Submitted by:

A handwritten signature in black ink, appearing to read "Margaret T. Downey". The signature is fluid and cursive, with a long, sweeping underline.

Margaret T. Downey, Administrator

cc: Tom Michelman, Sustainable Energy Advantage (tmichelman@seadvantage.com)

Cal Brown, Sustainable Energy Advantage (cbrown@seadvantage.com)

