



January 29, 2024

SMART Program
Department of Energy Resources
100 Cambridge St #1020
Boston, MA 02114

To Whom it May Concern:

PV Squared is a worker-owned cooperative and licensed electrical contractor that has been serving Massachusetts homeowners and businesses for over twenty years. We appreciate the opportunity to provide you with feedback on the SMART incentive program. Please see our responses below regarding two specific prompts/questions from the SMART Stakeholders questionnaire:

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?

SMART incentive rates need to be worth more than REC's (Renewable Energy Credits) in order to make the SMART program relevant. Currently that is not the case for the vast majority of BTM project types and utility rates.

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?



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The reporting compliance requirements associated with solar energy systems paired with an ESS are particularly onerous for PV Squared as a small scale, local installer. There has been much confusion among installers and manufacturers around the interval data requirements as well as a complete lack of feedback from the DOER on the quality or content of our past two years of reporting. We strongly urge that the DOER shift this reporting requirement from the system installer to the manufacturers of the ESS equipment, who are much better positioned to extract and interpret these large data sets.

Thus far, PV Squared has ESS-paired systems from three different manufacturers all with different systems/software for exporting and analyzing the data. For two of the three manufacturers, we rely completely on the manufacturer to extract the data for us, but then must analyze and submit the responses ourselves. As an electrical contractor, we are not well positioned to analyze thousands of data points associated with the interval data (expected to show 52 discharge cycles of each ESS). We find these reporting requirements to be extremely challenging for our personnel. Reporting for 2022 was delayed because two manufacturers were unable to provide us reporting in a timely manner. It is our understanding that Tesla has been submitting the interval data directly to the DOER, which we feel is a much more appropriate system and delineation of responsibilities.

The expectation that installers would continue this reporting for five years of the SMART incentive term with an ever-expanding fleet of customers/SMART projects well after the project contracts and budgets have been completed is a burden that presents a significant disincentive for participation in the program.

Warm Regards,

PV Squared