

SMART Stakeholder Questions with Comments

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?

Projects under 25kW AC should be eligible for all project adders, especially building mounted.

b. Should other project types also be prioritized?

There should be a non-profit organization adder. There should be an American made equipment adder. There should be Massachusetts made equipment adder.

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?

A structure with fewer blocks and greater decline would be simpler than a greater number of blocks and smaller decline. However, at the moment any decline makes it not make sense to apply for the SMART program in general. The declining block structure should be eliminated from the policy and the current blocks should remain in effect until funding is gone.

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?

There are some municipal utilities that have no solar incentive that would be great if they could be incorporated into the SMART program.

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 is fine for projects under 25kW, but once a project is over 25kW the timeline to completion extends greatly. Internal engineering takes closer to 2 months as opposed to a week. Getting utility approval takes months or more if the project is put into a group study. Procurement due to supply chain constraints has taken 8-12 months for certain gear. That can significantly increase the time for construction and getting final approval.

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.

It would be great if non-profits could get their own offtake adder.

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?

Getting hourly data for projects from the entire year for solar plus storage project is a huge challenge. It would be better if we could just do this once and not have to do it every single year, or just say that the customer is participating in Connected Solutions and not have to provide that 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.

My customers are always confused by the Reminder: E-signature(s) Required: email asking for their signature after they have already signed the document at the end of the project. You should be able to tell if they have already signed it. It also takes far too long for SMART to approve the claim at the end of the project.

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.

Yes, projects under 25kW AC.

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.

SMART being calculated based off the 3 year average price of electricity has allowed the utilities to increase their prices by so much that there is no SMART value. SMART should go back to the original average price of electricity when the program began and not change it. There should also be a minimum value per kWh that projects receive, so that there are not projects getting \$0.00/kWh.

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.

The program should not calculate incentive value based on what utilities are charging, as increased utility prices reduces the value of the SMART incentive.

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?

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.

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

We have abandoned the SMART program for most customers as the incentive rate is less than \$.01/kWh, or often \$0.00/kWh. Having a building mounted adder for systems under 25kW AC, incentive minimum, and no more block decreases is essential for residential and small commercial projects to start participating in SMART again.