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January 31, 2024

SMART Program
Department of Energy Resources
100 Cambridge St #1020
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To Whom it May Concern:

CET is a nonprofit working to advance resilient climate solutions for homes and businesses. We have been helping to innovate, implement, and scale environmental solutions in Massachusetts and beyond for nearly 50 years. We appreciate the opportunity to provide 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?

To remain relevant, SMART incentive rates need to be worth more than REC's (Renewable Energy Credits). That's not currently 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?

While CET is not an installer, our understanding from partners in the field is that the reporting compliance requirements for solar energy systems paired with an ESS are particularly onerous for small-scale installers and are stymieing adoption and deployment of storage. One solution may be to shift the reporting requirement from the system installer to the manufacturers of the ESS equipment, as they are better positioned to extract and interpret the large data sets.

Further hindering deployment of ESS is the expectation that installers continue reporting for the full ten-year SMART incentive term. This is an immediate disincentive for participation in the program.

Sincerely,

Ashley Muspratt, CEO
CET