



# The Commonwealth of Massachusetts

House of Representatives

State House, Boston 02133-1054

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Commissioner Elizabeth Mahoney  
Massachusetts Department of Energy Resources  
100 Cambridge St., #1020  
Boston, Massachusetts 02114

Dear Commissioner Mahoney,

Thank you for the opportunity to participate in the SMART program review stakeholder feedback process. The comments provided are collectively responsive to questions 1, 10, 13, and 14 of the Department's 12/21/23 document "SMART Stakeholder Questions."

Through the several iterations of the SMART program, ratepayer funds have helped facilitate thousands of megawatts of solar energy in projects across the Commonwealth. The evolution of the SMART program has also brought about important and necessary improvements including the mandate of battery storage and financial disincentives for siting projects on certain types of land. The current program review provides an opportunity to build on the program's previous improvements and align the state's solar incentive program with the latest science, data, and policy goals from the Healey administration.

The Department ought to look to two Healey administration documents in particular when revising the SMART program. First, the "Technical Potential of Solar Study" commissioned by the department and released in July 2023 is a meticulous review of the suitability of solar parcel by parcel throughout the Commonwealth. The second is the "Forests as Climate Solutions" report released in December 2023; specifically, the unanimous recommendation to protect natural and working lands (NWL) from land use conversion like industrial scale ground mount solar. By using these Healey administration documents to guide program revisions, the SMART program will not only align with the Commonwealth's forward-thinking climate and energy policies; but will protect our natural and working lands while meeting our ambitious solar energy goals.

The single most important change the Department can make is to eliminate the ratepayer subsidization of industrial scale ground mount projects that often lead to clear cutting large swaths of natural and working lands. The Department ought to remove incentives for all non-net metered solar projects larger than 1MW proposed on NWL as defined by MGL c.21§1. The preservation of our NWL is essential to meeting our carbon goals, preserving habitat, and maintaining strong local food systems among many other benefits. The "Forests as Climate Solutions" report spells out the myriad benefits our NWL provides and the perils of further land use conversion.

In the past it might have been reasoned that these large ground mount installations were necessary to meet the Commonwealth's solar energy goals, however the Department's "Technical Potential of Solar" report provides incontrovertible data to the contrary. The report found that there is 92MW of "highly suitable" solar potential among small ground mount, canopy, and rooftop parcels in the state. This is 300% of the total solar energy called for in the state's Clean Energy and Climate Plan (CECP). The 92MW of highly suitable potential could be supplemented by a portion of the 60MW of highly suitable large ground mount solar potential that is situated on disturbed or developed land.

Instituting this program improvement would not, in and of itself, prevent landowners from siting large ground mount solar arrays if they choose. However, this common sense measure would ensure that Massachusetts ratepayers are not compelled to underwrite the clear cutting of our forests.

Incentives for rooftop and canopy projects should be increased to facilitate robust interest from developers and property owners of highly suitable parcels. In addition to the financial incentive for canopy and rooftop projects, the Department should explore opportunities to streamline the administrative processes and prioritize these types of projects including allowing multiple projects to be filed under a single application.

The municipal permitting process is another area where the Department should consider increasing technical support, especially to small and rural communities. These towns often are interested in facilitating rooftop and canopy projects but lack the expert staff and resources to ensure an efficient and effective local permitting process is in place.

Advances in battery technology should also be examined to ensure that storage aspects of solar projects are required to use the safest batteries with the least negative impact to our environment. In particular, the Department should pay special attention to concerns around thermal runaway and off gassing.

The urgent and responsible transition to non-carbon emitting energy remains as one of the most important tasks our state faces. I appreciate the tireless efforts the Department continues to exert towards this shared goal. I am available at your convenience to further discuss the suggested program improvements. Thank you again for the opportunity to offer comments as part of the SMART program review.

Sincerely,

A handwritten signature in dark ink, appearing to read 'AS', with a long horizontal flourish extending to the right.

Aaron Saunders  
State Representative  
7<sup>th</sup> Hampden District