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Ms. Samantha Meserve
Director of the Renewable and Alternative Energy Division
Massachusetts Department of Energy Resources
100 Cambridge Street, 9th Floor
Boston, MA, 02114

Dear Ms. Meserve,

The Northeast Clean Energy Council (NECEC) and Solar Energy Industries Association (SEIA) appreciate the opportunity to provide stakeholder feedback in response to the Massachusetts Department of Energy Resources' (DOER) review of the Solar Massachusetts Renewable Target (SMART) program and in response to the stakeholder questions, issued on December 21, 2023.

Since implementation in 2018, the SMART program has driven distributed solar development in the Commonwealth, making the state a leader early on in the effort to address climate change. We appreciate Massachusetts leadership on the shift to emissions-free clean energy and look forward to working with DOER as we build on an already strong solar, and solar + storage program. Before answering the specific Smart Stakeholder Questions, we provide our perspective on the overarching structure of the program, which warrants consideration to ensure that SMART continues to help the Commonwealth achieve its decarbonization mandates:

A declining block structure may no longer be the best approach. Declining blocks are an effective tool provided development costs also steadily decline. Over the past three years, however, the solar industry has experienced substantial challenges that have increased costs, including:

- 1) Interconnection challenges, which remain a major barrier to development. High upgrade costs along with long timelines to interconnect add substantial development costs to projects and prevent projects from coming online quickly. The declining block structure adds uncertainty to reservations as long interconnection study waits make it difficult to model projects based on a specific block.
- 2) Equipment costs rose in 2023, due to supply chain constraints and economy-wide inflation. Furthermore, module shipments were impacted by the Department of Commerce Anti-Dumping and Circumvention (AD/CVD) trade case in 2022 and 2013, which continues to impact panel component prices and supply.

Given these, and other considerations addressed below, NECEC and SEIA recommend building an adjustable block program with sufficient flexibility to allow DOER to assess and adjust SMART program compensation (with appropriate process) such that development continues as needed to meet climate objectives in a cost-effective manner.

Responses to the SMART Stakeholder Questions

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?**

Overall, the SMART program has a comprehensive list of adders. NECEC and SEIA support DOER's current review of the costs associated with installing solar and encourage all adders to be reviewed and adjusted to reflect the outcomes of that analysis. Regular review of adder disbursement, eligibility criteria, and value would ensure the adders are sufficient to achieve the desired development outcomes.

- i. **Canopy adder recommendations:** Additional flexibility in defining what qualifies as a canopy would allow wider adoption. We also recommend considering a longer compensation rate term for financing purposes. Finally, we encourage re-evaluation of the adder amount to ensure that the value of the adder is sufficient to offset the additional cost of steel required for canopy installations.

- ii. **Low-income customer adder recommendations:** Community Solar is one of the most effective ways for low-income participants to access solar. The current community solar adder is insufficient to drive adoption and needs reconsideration. NECEC and SEIA support the recommendations of the Coalition for Community Solar Access (CCSA) and have included them here:

1. The current methods of qualifying as a low income customer for the purposes of filling a Low Income Community Shared Solar project are appropriate but not sufficient. The R-2 low income discount rate captures only a small portion of qualifying customers, and the geographic eligibility criteria also will exclude many low income households that live in neighborhoods outside of the qualified census block groups. Low income customers should also be able to qualify on the basis of participation in other needs-based programs, namely those that qualify a customer for participation in the R-2 rate, such as Medicaid, EAEDC, Food Stamps, Supplemental Security Income, etc. CCSA also encourages DOER to allow customers to self-attest their income status in order to qualify. Customers are otherwise weary of providing sensitive financial or personal information in order to enroll as a low income customer.

2. Net crediting is an important tool to allow for low income customers to participate. Many low income households are unbanked and pay their utility bills in cash; net crediting allows these customers to participate. Without net crediting or another form of single billing, community solar customers receive a separate invoice from the community solar provider for their subscription fee, typically based on the value of the credits generated and allocated to the customer. The two billing system can create confusion and mistrust from the customer, especially as billing cycles may be offset between the utility and community solar provider and therefore the value of the credits may not align perfectly between the utility bill and the community solar bill. Net crediting avoids such confusion, and also prevents the customer from having to pay for community solar credits before they are applied to the customer's electric bill. It also allows low income customers to continue to pay for their electric bill - and community solar subscription - in their preferred method, including by cash at authorized locations.
- iii. **Building mounted adder recommendations:** An increased adder would allow for panel installation on buildings where a new roof is needed prior to installation or during the 20-year tariff term. The current \$.0192/kWh does not help to cover the cost of roof replacement, which is needed if the Commonwealth wants to provide an added inducement to focus on rooftop solar.
- iv. **Storage adder recommendations:** The energy storage system (ESS) adder does not currently provide sufficient value to offset the increased cost. The energy storage compensation adder does not account for the added value that storage brings to the grid and we urge DOER to increase the value. Consideration of an upfront rebate would also improve the ability to finance ESS projects. We would also like to see an option for standalone storage, which is currently not included in the SMART program. We encourage DOER to consider how to incentivize both paired and standalone storage within SMART (or in a separate SMART-style program aimed at reaching storage deployment objectives). Additionally, the current ESS requirement for any project over 500kW means that solar installations are sometimes downsized where ESS doesn't make economic sense or due to interconnection limitations. We urge DOER to look at increasing customer flexibility with regards to ESS or a simplified exemption process, especially for project types that satisfy other public policy objectives. For instance, the ESS requirement for floating solar and agrivoltaics projects can often be challenging given land and yield constraints, and we encourage DOER to evaluate the benefit of the ESS requirement for these and other installations that provide additional benefits above and beyond solar deployment.

- v. **Land Use and Location Based Adders** we address land use and location-based adders in questions 3, and 9.
 - b. **Should other project types also be prioritized?** We encourage consideration of standalone storage. It is also important to emphasize that while we strongly agree with including program adders to offset the additional cost of installing solar in the built environment, we urge DOER to ensure that new SMART guidelines do not penalize ground mounted projects, which must be built alongside rooftop, canopy, etc., to reach our critical climate mandate.
- 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?** As stated in the introduction we recommend a more flexible program structure to allow DOER to respond to market forces as needed. Overall, certainty and predictability are essential for financing and bringing projects online. We further add that it is important that declining block reservation timelines continue to take into consideration the interconnection realities across the Commonwealth. We appreciate the blanket extension provided by DOER.
 - a. Additionally, for rooftop residential projects, we recommend simplifying participation by removing the block structure altogether and instead establishing a minimum rec value that is equivalent to the value of Class 1 RECs. There must be sufficient value provided in order to make it worthwhile for residential projects to opt into participating in the SMART program again given the added costs and friction in order to participate.
 - b. With an established minimum REC value that approximates the value of a Class I REC, DOER should also consider increasing the payment term from 10 years to 20 years. There is no need to have systems switch from SMART to class 1 after year 10 if the values being paid for the RECs are equivalent.
 - c. With a fixed incentive amount, BTM systems that accept a fixed 20-year incentive should be allowed to increase system size to meet future electrification loads without having to install a new SMART meter. (New or amended ISAs would still be required for the additional capacity.) The expanded capacity would be compensated at the same fixed rate.
 - d. It is better for residential projects to participate in SMART in order to 1) ensure RECs are delivered for compliance purposes, 2) provide the increased consumer protections in SMART, 3) provide better insights into the market to help shape policy, and 4) is easier for residents to navigate.
 - e. We recommend that all non-residential Behind the Meter systems be able to secure a SMART block reservation upon interconnection application, rather than having to wait until application approval.
- 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?** Land use eligibility criteria are a barrier to participation. We

urge the department to consider a more nuanced approach to assessing land suitability (for example, while imperfect, the Technical Potential of Solar Study was a step in this direction and, in some instances, land identified in the study as highly suitable for solar is excluded from the SMART program).

- a. At a minimum it is critical that any restrictions related to BioMap layers be limited only to land that is actually designated as Priority Habitat, Core Habitat or CNL. The current requirement restricts development on an entire parcel if 50% or more of its area is designated as Priority Habitat, Core Habitat or CNL. If 51% of a 300 acre parcel is designated as CNL, the remaining 149 acres that do not have a BioMap designation should not be subject to any solar development restrictions.
 - b. Further, rather than the current prohibition on most ground mount solar on BioMap-designated land, the SMART program should instead establish guardrails for solar development in these areas. These guardrails could include:
 - i. Design and construction standards to ensure solar sites continue to provide habitat for critical species that are documented to be present or nearby the site.
 - ii. Partnership with an approved conservation organization to develop and implement a site specific conservation plan.
 - c. Finally, we hope DOER will consider the anticipated recommendations of the Commission on Clean energy Infrastructure Siting and Permitting as applicable.
- 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 current SMART reservation period excluding blanket extensions is insufficient. We greatly appreciate the additional time granted to projects by DOER and generally think that the two-year initial reservation, with additional time for projects delayed due to the CIP process, is workable. We recommend removing the additional steps required to access extensions for projects awaiting utility upgrades as part of the CIPs and ESMPs.
- 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 to spur project development of the project type.**
- a. **Bidirectional charging incentive for residential, fleet, and workplace:** The current SMART program offers an energy storage adder for solar projects paired with energy storage. Vehicle-to-grid (V2G) technology is emerging as a commercial offering as part of the increasing availability of bidirectional EVs and bidirectional, grid-support charging stations. EVs with V2G capability, when paired with bidirectional grid-support EV charging equipment, can provide the same functions as stationary storage systems. As such, the SMART program

should include an incentive for solar customers to purchase bidirectional grid-support chargers to allow their EV to provide grid-tied storage services. This technology will allow EV owners to charge their cars with solar power and send that solar-generated electricity back to buildings or the grid, similar to the way in which a stationary storage system operates. We encourage DOER to look to V2G leaders to better understand how and where these technologies could be incorporated into SMART.

- b. **Solar-powered Direct Current Fast Charging facilities for EVs.** Specifically, for solar-powered DCFC facilities, DOER should allow metering of DC current that is used to charge an ESS that is used to supply DCFC EV supply equipment, compensating the facilities the same amount for the DC kWh as the AC kWh that might be exported to the grid. DOER should create an adder for solar-powered DCFC facilities.

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? As noted in question 2, we recommend removing steps for residential rooftop participation in SMART.

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.

- a. Improved visibility into review timelines and tracking from ClearResult to DOER would be helpful.
- b. Currently, the required documentation and appropriate contacts for requesting an exception to one of the SMART program rules are located in various Guideline documents and can be difficult to find. For clarity, it would be helpful to create a single document or website listing the required documentation for each type of exception request and relevant department contacts.
- c. If residential projects are provided a fixed minimum REC value, DOER and ClearResult should evaluate whether the process for residential projects could be consolidated into a single step process rather than retaining the unnecessary reservation and incentive claim structure. This would help reduce the administrative burden for ClearResult and DOER by only requiring a single SoQ, no issues regarding changes in project information between reservation and incentive claim, need for extensions or SoQ expiration management.
- d. Make the cost of SMART applications more transparent (discoverable) before the end of the application process. The SMART application fee includes both application and metering fees; the meter fees are not disclosed/knowable.

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.

As discussed above, the solar canopy adder is hard to make work and additional funds or economies of scale are needed.

- a. We suggest expanding eligibility for the Solar Canopy Adder to include systems built over a wider variety of developed land and impervious surfaces. Examples - canopies over:
 - i. Outdoor farmyard areas, such as livestock yards.
 - ii. Grounds used for flea-markets, farmer's markets and fairs.
 - iii. Playgrounds
 - iv. Dog parks
- b. Suggested edits to definition: Canopy Solar Tariff Generation Unit. A Solar Tariff Generation Unit with 100% of the nameplate capacity of the solar photovoltaic modules used for generating power installed ~~on top of~~ over a parking surface, pedestrian walkway, farmyard, or other partially- or wholly impervious ground surface, or over a canal or other manmade water body, in a manner that maintains the function of the area beneath the canopy. A greenhouse-integrated photovoltaic system using semi-transparent modules as roof or wall glazing may qualify as a Canopy Solar Tariff Generation Unit.

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. Massachusetts has been a leader on this issue and because of this, we strongly encourage the following updates to the current agrivoltaics adder in lieu of recommendations based on other programs. NECEC and SEIA support BlueWave Solar's agrivoltaics recommendations and have included them here:

- a. Tree Removal/Newly Created Farmland: The interpretation of the current ASTGU guideline that not a single tree may be removed from the footprint of any Agricultural Solar Tariff Generating Unit (ASTGU) in the SMART program is not consistent with the language in the Guideline and is a major barrier to the continued development of agrivoltaic projects in Massachusetts.
 - i. It is extremely difficult to find new sites where not a single tree would need to be removed and this requirement is preventing projects from moving forward.
 - ii. Trees are commonly found in pastures and other agricultural fields and often need to be removed as a routine part of agricultural activity. Agrivoltaic projects have the same needs.
 1. Trees are often intentionally left in pastures to provide shade to the grazing animals; in an agrivoltaic array, the trees need to be removed and shade will instead be provided by the solar panels.

2. Trees around the edges of fields often need to be cut annually to restore the field following encroachment by woody or invasive species,
 3. Trees around the edges of fields often need to be cut to improve the field by reducing shading, “squaring off” an irregularly shaped field, or to provide turning areas for farming equipment cultivating higher-quality soils in the primary field area.
 - iii. There is no clear definition of “tree” or “forest land”, making it impossible for developers to have certainty that a project complies with the current interpretation of program rules. It is also unclear what constitutes a tree vs sapling vs brush, etc.
- b. Newly Created Farmland language should be removed (Section 4 ii. of Guideline)
- c. To address concerns about clearcutting forests to create agricultural fields for ASTGUs, we suggest the following language to replace Section 4) Eligible Farmland of the current ASTGU Guideline:
 - i. An ASTGU must be sited on land that is owned or leased by a farmer and meets one of the following criteria:
 1. Land is currently enrolled in M.G.L. c. 61A; OR
 2. Land has been enrolled in M.G.L. c 61 A in the past five years; OR
 3. Land that is classified as Important Agricultural Farmland
 - ii. In addition to meeting the criteria above, the following restrictions apply:
 1. An ASTGU may not be sited on land with 50% or greater mature forest cover (Within last 5 years prior to PDA submission)
 2. An ASTGU may be sited on land with less than 50% mature forest cover when such land is documented to be or to have been actively devoted to non-forestry agricultural uses prior to application to the SMART program.
 - a. Such eligible uses include pasture, hay production or other cropping but do not include agricultural woodlands or maple syrup production.
 - iii. Amend comparable crop requirements currently applicable to projects that propose new grazing or hay production on Important Agricultural Farmland that is already in agricultural production (Section 5 of current ASTGU Guideline).
 1. Farm resilience relies on the ability to make changes based on market dynamics and environmental factors. Some transitions to more sustainable agricultural practices and farm succession plans are prevented by this rule.
 2. Apply comparable crops standard: only when the ASTGU acreage of prime soils previously used for food production exceeds 30 acres.
 - a. The 30-acre threshold is intended to reflect the acreage that is required for meaningful food crop production. This requirement would result in 10 to 15 acres remaining in

- food crop production (based on current percentage requirements for projects involving hay production vs grazing). 10 - 15 acres are large enough to be agriculturally viable across a wide variety of crop types and maintain operational efficiency
3. Additionally, we recommend the following language to clarify the phrases “newly-proposed” and “comparable crops”:
 - a. *“Newly proposed grazing of animals or production of hay is defined as grazing or hay production on a site that has not been used for these agricultural purposes during the 10 crop years prior to the Pre-Determination Application, when proposed to be performed by a farm operator who has less than 3 years of experience with the proposed activities.”*
 - b. *“Comparable crops is defined as crops which by their production and harvesting, on-farm usage or processing, marketing and other factors are relatively comparable in agricultural practice, equipment requirements, economic value, environmental impact, and other factors to the crops previously grown on the site or previously grown by the proposed operator. If proposed crops are similar in some respects and different in other respects, the experience, judgment, and capacity of the proposed farm operator shall be given deference in determining suitability.”*
 - iv. Eliminate “Each Square Foot” language from Exception Request from Max Direct Sunlight Reduction Requirements
 1. Eliminate the specific “each square foot” language for waivers. It creates a technical impossibility for mechanized commercial agriculture.
 - a. You can’t perform mechanized agriculture in each square foot of a solar array because you can’t drive equipment through the posts of the array.
 2. Instead say *“demonstrate how the majority of the area directly beneath the solar modules will be used for agricultural production and/or demonstrate the improved overall agricultural productivity across the entire field that will result from the proposed design.”*
 - v. Change “Waiver for Decreased Yield” Process
 1. The addition of the Waiver for Decreased Yield in April 2022 Guideline implies projects must have a specific level of productivity to remain qualified, which is not specified in regulations and is not compatible with the realities of agriculture.
 2. Clarify that there is no pre-emptive requirement for farmers to request approval from MDAR/DOER prior to making operational changes like changing crops or practices.

- a. Farmers are not willing to sign agreements with the risk imposed under the current process/language.
 - b. Farmers will not agree to being required to request approval to change crop types.
- vi. Clarify that waiver is only necessary when production falls below 50% of historical typical yield or 70% of planned/anticipated yield.
 - 1. Requirement should not be based on prior year's production. A farmer should not be expected to have a bumper crop every year after one year's bumper crop.
 - 2. Recommend amending Section 6.1 of ASTGU Guideline to say:
 - a. "Due to unforeseen circumstances, such as but not limited to weather events, pests, or change in crops, the projected agricultural yield for any given year may be substantially lower than anticipated in the agricultural plan. While no pre-approval of crop changes or production practices is required, continuous, good-faith efforts at commercial agricultural or horticultural production is a requirement for continued ASTGU incentive eligibility. In circumstances when production of planned crops falls below 70% of anticipated yields, or below 50% of typical yields for the soils and production practices under open-field conditions in the case of a new agrivoltaic crop, an applicant can request a waiver from the Department for decreased yields. The applicant must demonstrate to the satisfaction of the Department, in consultation with MDAR, that a waiver is warranted for good cause."

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. We recommend changes to the Value of Energy level. Right now the incentive value is at zero. DOER could not have anticipated global issues such as the pandemic, war, supply chain delays and high natural gas prices when designing the SMART program. It may be prudent to find a way to ensure some sort of minimum incentive payment

- a. Another idea is a minimum payment of the ACP rate. That way we would not see RECs being set at zero.
- b. Base rates- construction costs are high. DOER could create some indexing so as not to have to re-visit the VOE every year.

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. As discussed above, adjusting the SMART program to allow DOER additional

flexibility would create a framework for responding to unanticipated market changes to keep clean energy deployment on track in the Commonwealth.

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? In 2023, SEIA became an American National Standards Institute (ANSI) accredited standards developer. SEIA can now develop national standards and has convened committees to create consumer protection standards for residential installations, salesperson training, contracts, and marketing claims. These committees must represent a balanced set of interests and there is a mandatory public review and comment process. We urge DOER to consider SEIA standards development process and timeline (Q2 for the installation best practices and Q3 for public comments for the broader consumer protection standards) when contemplating consumer protection measures. We also encourage DOER to weigh in during the public comment period.

- a. NECEC and SEIA support CCSA's recommendations to improve the customer experience and ensure consumer protection. As noted previously, Net Crediting in particular has potential to ensure that all customers can participate in going solar. We also support additional requirements to ensure a positive customer experience, such as prohibiting credit checks as a requirement to enroll, prohibiting cancellation fees, and requiring guaranteed savings for all customers and a minimum savings level for 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. The 2050 Decarbonization Roadmap estimated that approximately 60,000 acres of additional ground mounted solar would be necessary to reach net zero by 2050. We are concerned that the land use restrictions within SMART are a barrier to reaching the 2050 mandate. A more nuanced approach to siting solar could increase the availability of suitable sites. Additionally, Governor Healey ran on a goal of 10 GW of solar by 2030. According to Wood Mackenzie forecasts, the state will fall short of that goal. Over the next five years, Massachusetts is expected to install roughly 1.8GW of new solar capacity¹.

Massachusetts Solar Installation Forecasts 2023-2028 (in MWdc)							
2023	2024	2025	2026	2027	2028	Total 2023-2028	Cumulative thru 2028
291.88	306.12	320.2	309.38	302.52	294.39	1824.48	6,031.75

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

¹ SEIA/Wood Mackenzie U.S. Solar Market Insight Q4 2023

a. Alternative On-Bill Credit (AOBC) Inter-utility Transfer:

- i. We urge that the next iteration of SMART include AOBC inter-utility transfer. The 2021 climate law, An Act Creating A Next-Generation Roadmap for Massachusetts Climate Policy, provided for inter-utility transfer of net metering credits under Section 84 of the legislation, but, in a seeming oversight, neglected to provide similar treatment for AOBCs.
- ii. We know of no policy rationale for this distinction. We understand that the electric distribution companies (EDCs) have previously voiced concern about the administrative complexity of inter-utility transfer, but the inter-utility transfer of AOBCs should provide no added administrative burden for the EDCs above that which they must already undertake to meet their statutory obligation to allow for inter-utility NMC transfer.
- iii. Closing this loophole would ensure equal regulation of net metering and SMART facilities and, as with inter-utility NMC transfer, maximize offtaker opportunities given the concentration of offtakers, including public entities, in the Boston metro area in Eversource territory and the many SMART projects sited in National Grid territory. Indeed, many public entities have land holdings and or electrical accounts that span both Eversource and National Grid territory; this solution is of particular importance to them. Finally, AOBC inter-utility transfer would also offer a pathway to offload the AOBC surplus many municipalities currently must manage due to the spike in AOBC rates over the past 24 months while the municipalities received supply through legacy competitive contracts.

b. Expand support for new construction and municipalities

- i. Cities and towns are looking to support state and local clean energy and green construction goals, including solar on new buildings. Consideration of creating a classification for new construction might be helpful. It would be highly beneficial for there to be a different process for new construction, particularly for the public sector. Public construction takes years and requires more certainty than a declining block program offers.

We appreciate the opportunity to provide comments as part of DOER's review of the SMART program. The SMART program has been a success to date and we look forward to seeing adjustments that reflect current development economics as well as the Commonwealth's decarbonization mandate, to ensure that the program remains effective going forward. Please don't hesitate to reach out for additional information.

Sincerely,

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/s/ Valessa Souter-Kline
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