

SMART Stakeholder Questions

12/21/23

In order to evaluate potential amendments to the Solar Massachusetts Renewable Target (SMART) program (225 C.M.R. 20.00), the Department of Energy Resources (DOER) seeks stakeholder feedback to the following questions.

In your responses, DOER respectfully requests that stakeholders limit feedback to SMART program regulations, structure, and definitions. There are numerous regulatory and permitting processes that interact with the SMART program that DOER does not directly oversee, regulate, or enforce, including tariffs, interconnection processes, net metering, and local permitting. While DOER recognizes that these areas impact solar development, please refrain from including these subject matters in your responses.

The deadline for submitting written comments on the questions for the SMART review is **Friday, February 2, 2024 by 5pm**. Written comments should be submitted to DOER.SMART@mass.gov and copy both CBrown@SEAdvantage.com; tmichelman@seadvantage.com with “SMART Review Comments” in the subject line. As an alternative, the public may submit written comments via mail to the Department of Energy Resources, 100 Cambridge Street, 9th Floor, Boston, MA 02114, attention Samantha Meserve. Please be advised that there may be delays in receiving written comments via the mail.

If you have any questions on these updates, please contact DOER.SMART@mass.gov.

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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?

b. Should other project types also be prioritized?

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?

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?

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.

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.

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?

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.

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.

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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.

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.

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?