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October 28, 2016

Commissioner Judith Judson
Massachusetts Department of Energy Resources
100 Cambridge Street
Boston, MA 02114

RE: Comments on Next Solar Incentive Straw Proposal

Dear Commissioner Judson,

As representatives of a statewide coalition of community organizations, labor unions, and environmental groups, we thank you for your efforts to create this urgently needed solar incentive program, and for the opportunity to respond to your proposal.

The primary interest of our 100,000-strong membership is to secure fair access to the many benefits of solar energy for all, while growing the sector to capture its full potential to mitigate climate threats. Our communities have borne the brunt of impacts from the current fossil-based energy system, and have been excluded in many ways from accessing the benefits of the transition to clean energy systems. With this in mind, we suggest the following provisions for this next solar incentive program:

We applaud and endorse the incentive adders enumerated in DOER's straw proposal. However, other project categories are in need of similar support and we urge the Department to incorporate adders for them as well. These include projects for ratepayers just above the low-income threshold, up to 120% of State Median Income (the level we introduced as the moderate-income threshold in deliberations for the state's energy efficiency program). These moderate-income households comprise nearly 40% of households statewide above the 60% SMI low-income threshold, and face specific barriers to clean energy adoption that deserve attention.

Additionally, we support creating an adder for environmental justice (EJ) communities, which have long borne undue burdens from the fossil fuel system, face unique barriers to participation (including language), and require concerted state effort to make the transition to clean energy systems. The Administration should qualify EJ communities for specific benefits rather than require individual household qualification, and thereby significantly lower barriers to participation for EJ community residents.

We strongly discourage the use of monthly fixed charges, which are not an equitable way to recover costs. They would act as a disincentive for residents to use conservation or efficiency measures and shift the cost burden from high-usage and low-efficiency users to poorer and more efficient ones. Instead, costs should be recovered through per-kWh charges.

We are concerned about the development of brownfield sites for solar generation. Unremediated sites are a continuing environmental justice threat to the surrounding host communities. Even given any economic opportunities that would arise from such development, environmental toxicity is an unfair burden to force already-disenfranchised communities to continue to bear. We suggest a Departmental standard to require an evaluation of the impact of brownfields in populated areas or in areas where groundwater is affected, before solar development can be permitted and incentivized in those areas.

Finally, the Administration should pay close attention to how jobs and economic opportunities stimulated by new solar developments are distributed geographically and across demographics. With high unemployment rates in environmental justice communities across the state, the Administration should require businesses in this growing industry to adopt good job, health, and safety standards, targeted training programs and career pathways for women, people of color, and youth to ensure equal access and opportunity for all Massachusetts residents.

Sincerely,



Darlene Lombos, for the Green Justice Coalition

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Chinese Progressive Association
Clean Water Action
Coalition for Social Justice
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