



VIA ELECTRONIC MAIL

Eric Steltzer

Director, Renewable and Alternative Energy Division

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October 13, 2021

Comments regarding Solar Massachusetts Renewable Target Program (225 CMR 20.00) (the “**SMART Program**”), Statement of Qualification Reservation Period Guideline

Dear Mr. Steltzer,

Sunwealth Power, Inc. is a public benefit corporation headquartered in Cambridge, Massachusetts that develops, finances, owns, and operates commercial-scale solar projects. Sunwealth works to build a solar energy economy that is far-reaching and inclusive, and it is grateful that the Massachusetts Department of Energy Resources (“**DOER**”) shares this vision. Sunwealth thanks DOER for the prior work it has done to grow and democratize the clean energy economy, and it appreciates the steps that the DOER is taking to continue supporting solar energy development with the SMART Program.

Our team has carefully reviewed the Statement of Qualification Reservation Period Guideline, and we humbly submit the following suggestions:

- 1) **Section 6E:** In addition to the previously included list of circumstances related to COVID-19 that may require further extension, we request the current text be modified to read (proposed changes are italicized in red):

“Applicants who are experiencing additional delays due to the COVID-19 pandemic may seek a further extension for good cause. To assist the timely review of these requests, the Department provides the following guidance... - Site Access: Applicants should provide documentation to verify site access has been restricted by property owners *and/or federal, state, or local government shutdown orders related to COVID-19 precautions*. Documentation could include but is not limited to written communication from the property owner to the applicant detailing the site access limitations, *or a copy of the published government shutdown order*.”

- 2) **Section 6G:** To ensure it is abundantly clear that delays related to COVID-19 qualify as a good cause justification for extending the Storage Addendum Reservation Period, we request the current text be modified to read (proposed changes are italicized in red):

“If a Solar Tariff Generation Unit has already received an extension under Section 6(f), the Extended Reservation Period for a Fee: Storage Addendum, of this Guideline and can demonstrate to the Department’s satisfaction that good cause, *including delays due to the COVID-19 pandemic outlined in Section 6E*, warrants a further extension not provided for under Sections 6(b) or (c) or (d) of this Guideline, it shall receive an extended Reservation Period with a deadline of no more than 12 months, as determined by the Department.”

- 3) **Section 9b) vi.:** To ensure there is no ambiguity in the guidelines, we request additional clarity around the language cited below, including the meaning of “evidence or demonstration of benefits” as used in this section.

“Evidence or demonstration of benefits to the municipality or government entity may also be considered.”

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Under the proposed guidelines, it is unclear what exactly constitutes “evidence or demonstration of benefits”, or what those “benefits” might be.

For example, would a solar project that decreased a municipality’s demand charges but offered no discount on energy to the municipality qualify for the adder based on the recently amended language?

Additional clarity is necessary to ensure that the adder is used as intended. Sunwealth proposes that the guidelines be further amended to clearly outline what will be considered as “evidence or demonstration of benefits” for the public entity adder. This will eliminate the ambiguity in this section of the guidelines.

The team at Sunwealth appreciates your consideration of our comments and hopes that they contribute to the finalization of the Statement of Qualification Reservation Period Guideline.

Sincerely,

DocuSigned by:

*Jonathan Abe*

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Jonathan Abe

CEO, Sunwealth Power