



Commissioner Judith Judson
Department of Energy Resources
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

April 25, 2019

Subject: SMART Program 400 MW Review - Problems and Recommendations

Dear Commissioner Judson:

A broad coalition of solar industry organizations including MassSolar, SEBANE, NECEC, SEIA, CCSA, and Vote Solar, provided the Massachusetts Department of Energy Resources (DOER) with a document on February 13, 2019 that identified several fundamental issues with the SMART program and made some preliminary recommendations as part of the 400 MW program review.

The undersigned solar industry businesses and advocacy organizations support the recommendations outlined in that document. We will not reiterate those recommendations here except to emphasize the urgency of expanding the SMART program by at least 3,200 MW, for a total program size of 4,800 MW.

However, the solar industry recommendations mentioned above did not fully address the need for greater market diversity, returning economic benefit to our communities through Behind the Meter (BTM) and smaller scale distributed generation installations and supporting Massachusetts based solar installation companies and the jobs they create.

We the undersigned are requesting that the DOER support the following recommendations in order to boost the small to medium size PV installation market, supporting local direct system ownership and the businesses installing them. This class of solar is critical to leveraging the local economic benefit of the SMART program and meeting the market diversity goals of the DOER.

Recommended SMART Program Expansion and Adjustments

1. To meet the Commonwealth's clean energy goals, the SMART program should be expanded by at least an additional 3,200MW, to 4,800MW. This expansion should be designed to support the DOER's goals for increased diversity of project type and to ensure more of the SMART program incentive remains in our local communities.

2. We recommend that the DOER create an additional carve out for systems greater than 25kW – 1 MW of no less than 500MW. We also recommend that the DOER increase SMART compensation levels for this segment to ensure program diversity goals will be achieved. The 400MW review should ensure that the SMART program provides adequate capacity for four years and adequate compensation rates required to serve a diverse base of clients, promote installation by Massachusetts based solar installers, and that a fair share of the expanded program benefits are returned back into the local economy.

We recommend a regular review and assessment of the 25kW – 1MW carve out that would determine whether the SMART program is providing adequate capacity to ensure that program diversity goals are achieved. This would include at least annual reviews of the total capacity of new projects receiving Statement of Qualification for this market segment to ensure that SMART program capacity is being adequately allocated among all market segments.

3. Two axis solar trackers are currently not eligible for any SMART program system adders. These high producing systems can easily produce enough power to offset the average residential load. Two axis trackers should be allowed to receive an adder. We recommend that the DOER allow two-axis trackers to receive the canopy adder and that systems under 25 kW also be eligible for this adder.
4. The EDC provides a solar energy system owner with a dedicated SMART meter. This meter measures the system's energy (kWh) output. It serves a fundamentally different purpose than the owner's traditional service meter. And yet some EDCs are, without justification, claiming that the SMART meter needs to be treated as if it were also a service meter, and that it must be located adjacent to the owner's existing service meter along with the disconnect. For a small-medium-sized solar project the expense of this arbitrary requirement burdens the client and discourages the adoption of solar. There has been clarification and a waiver procedure from National Grid regarding this issue. The other EDCs, Eversource and Unitil, have not made the same clarification and waiver for this siting requirement. The SMART program should ensure that all EDCs allow for the placement of the SMART meter and disconnect where it best benefits the solar owner.
5. Page 9 of the SMART regulation (225 cmr 20.05 (i) 2) addresses the restrictions/limitations placed on Replacement Solar Tariff Generation Units. 2a and 2b state that the replacement STGU not use components from the system being replaced, which makes sense. But 2c requires that "The existing Generation Unit [being replaced] has been inactive for at least one year prior to the submission of the Statement of Qualification Application." It is burdensome to

wait a year before submitting an SQA for a replacement STGU. A Massachusetts solar owner who wants to update an older system with new PV as part of the SMART program should be encouraged, not penalized in this way. The usable components of the older system can be recycled and/or donated to not-for-profit organizations. Additionally, this restriction should be waived for any system that has been operating for at least 10 years.

On behalf of the local solar industry, we the undersigned signify our support of the aforementioned revisions to the SMART program and urge the Baker-Polito Administration to move forward as quickly as possible to implement these recommendations.

Sincerely yours,



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Cc: Matthew Beaton, Secretary, Energy and Environmental Affairs
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