July 1, 2017

Commissioner Judith Judson  
Department of Energy Resources  
100 Cambridge Street #1020

Boston, MA 02114

CC: Michael Judge, Kaitlin Kelly, Department of Energy Resources

Transmitted via email: Judith.Judson@state.ma.us, michael.judge@state.ma.us, kaitlin.kelly@state.ma.us, DOER.SMART@state.ma.us

**RE: Comments on SMART solar incentive program**

**Dear Commissioner Judson:**

Thank you for your work to transition our Commonwealth to renewable energy. We write with concerns about inequities in the state’s solar programs and with the state’s proposed SMART solar incentive program. Although we believe good faith efforts have been made in recent months to expand access to solar, we urge you to modify the program to ensure all communities benefit from our state’s clean energy programs and from the growing green economy.

Specifically, with regards to “SMART,” we ask the DOER to take action on the following matters:

* *Creating Equity Carve-Out:* The DOER should ensure that a portion of the incentive serves low-moderate income communities by dedicating a percent of the incentive specifically to this purpose. Small residential solar sector has a carve-out, or dedicated portion of the incentive, in the new SMART program, presumably established to protect that segment of the industry. It would be only sensible to do the same for segments of ratepayers, i.e. low-moderate income ratepayers, by dedicating part of the incentive to them.
* *Ensuring compensation levels and adders are sufficient to development low-income and community shared solar:* Significant concerns have arisen around the feasibility of the development of low-moderate income solar projects under the currently proposed solar incentive program. For all communities to enjoy the benefits of solar energy, projects serving them must actually be built. The DOER should review the proposed compensation levels and provide a mechanism for regular review, with specific attention to whether the program is expanding access to solar. Fundamentally, if the state wants to see more low-income solar projects, weakening compensation will not spur additional growth, and beyond project feasibility under the general incentive, adders to incentivize equity should not be capped or otherwise expire.
* *Revising restrictive definition of low-income*: Currently, the DOER is focused primarily on the R-2 rate class, customers on the low-income discount rate. We fully support the inclusion of R-2 customers, but many renters and moderate-income consumers would actually be left out of this definition. We urge the DOER to include renters and moderate-income ratepayers in its programs. One pathway for achieving this without extensive income-qualification programs would be to additionally incentivize solar projects in Environmental Justice communities.
* *Creating guidelines to ensure customers receive equitable benefit*:The DOER is considering a mechanism to provide direct, on-bill benefits to solar customers, which is currently only available through solar net metering. It is currently unclear how such a replacement would or could work or whether customers would be fairly compensated. Establishing clear, equitable guidelines for this proposal is essential—otherwise, DOER should partner with the legislature to restore compensation for and eliminate barriers to solar net metering.

We thank you for your attention to these issues and welcome dialogue on ensuring equitable access to solar power in Massachusetts.

Regards,