



MEMORANDUM

Date: July 31, 2024

To: Full Commission

Subject: 2024 SMART Straw Proposal

The Massachusetts Department of Energy Resources (DOER) published the 2024 SMART Straw Proposal on July 10, 2024. DOER, based the 2024 Straw Proposal on a quantitative and qualitative analysis conducted by Sustainable Energy Advantage, LLC. Stakeholders are being asked to provide feedback on the Straw Proposal at technical sessions held in-person on July 22nd and 23rd and a virtual session held on July 29th or to submit feedback through an online form. The deadline to provide feedback is August 2, 2024.

DOER is seeking comments on the following categories:

- Structure (e.g. capacity blocks, rates)
- Process (e.g. reservation periods & extensions, program transition)
- Adders (inc. community solar, canopies, storage, others)
- Agrivoltaics (inc. guideline changes)
- Environmental Protection (e.g. greenfields subtractor, community benefits adder, monitoring & standards)
- Equity (e.g. low-income definitions, other initiatives)
- Consumer Protection (e.g. contracting requirements)
- Other Initiatives (e.g. education, compliance)
- Stakeholdering process

In September 2019, BRPC submitted comments on the SMART 400MW Review and Straw Proposal. At that time, BRPC expressed concern that, while we are supportive of solar development in general, we do have concerns regarding the types of projects developed. BRPC has consistently been on the record that our priorities are solar on rooftops, landfills and Brownfields. However, previous analysis indicated that the majority of the largest solar installations within Berkshire County have been developed on forested land and open space. BRPC remains concerned that the economics favor forested land, greenspace and agricultural land and that this trend will continue. BRPC also continues to be concerned about the development pressure on the Western part of the state, especially if the adders and subtractors are not strengthened.

With regard to the 2024 SMART Straw Proposal, BRPC has focused our comments on Adders (inc. community solar, canopies, storage, others); Agrivoltaics (inc. guideline changes); and Environmental Protection (e.g. greenfields subtractor, community benefits adder, monitoring & standards).

Adders

While the increased adders are an improvement, especially in categories such as Raised Racking where no adder previously existed, they fall well short of the increased costs

associated with materials and construction on previously developed land. An average \$0.02/kWh increase for adders to incentivize development of solar on the built environment is insufficient to offset the increased cost of such projects especially Raised Racking, Canopies and Brownfields projects.

BRPC is concerned that removing the energy storage adder for projects under ≤ 25 kWh and increasing the project size required to build an energy storage system from 500 kWh to 1 MW will make large scale and more centralized power generation and storage systems considerably more attractive.

BRPC supports efforts to off set the cost associated with building projects on public land, provided the public land is not open space, recreational or forested land. BRPC previously raised concerns with regard to whether \$0.04/kWh is sufficient to overcome the incremental costs associated with building on public land and provide enough value to the public entity to make the investment attractive. BRPC remains concerned that the Public Entity adder is insufficient.

Agrivoltaics

BRPC is supportive of efforts to broaden dual use agriculture and allow a greater number of projects to be eligible to receive this incentive. However, BRPC has concerns that the proposed revisions for newly created farmland don't demonstrate true dual use agricultural installation. The revision to deem all land intended to be newly created farmland as eligible farmland based on the pre-existence or viability of agricultural production is overly broad. The proposed changes to newly created farmland and the potential for a waiver for decreased yield provide little to no protection for agricultural lands.

Environmental Protection

BRPC is supportive of the efforts of DOER to steer development away from large scale ground mounted projects in undeveloped spaces. However, BRPC feels that the currently proposed greenfield subtractor is far from sufficient to offset the construction incentives needed to encourage and facilitate the development of solar projects on the built environment. Currently the flat \$0.06/kWh subtractor combined with the \$0.004/acre subtractor adds up to an insignificant cost compared to the overall construction cost of a 1 MW solar array. The Greenfield Subtractor is not sufficient to deter development on open spaces and forested land as it will be more cost effective for large solar developers to develop on open spaces and forested land despite the Greenfield Subtractor. As discussed previously, the adders available for built land projects fall far short of offsetting the additional costs associated with those projects. Both the Greenfields Subtractor and Location Based Adders should be increased.

DOER has proposed a new Community Benefits Adder, which consists of establishing a new \$0.06/kWh adder for applicants that conduct proactive community engagement throughout the project development process. BRPC has a number of significant concerns regarding this proposed adder. Conducting proactive community engagement does not ensure a project will result in community benefits. BRPC has observed first hand that community engagement under MEPA review for impacts to Environmental Justice communities has fallen far short of the goal and intent. A Community Benefits Adder should only be considered for projects with a proven community benefit. BRPC strongly disagrees with the proposal to make the Community Benefits Adder available to ground-mounted projects that are receiving the Greenfield Subtractor. This is completely counterintuitive and offsets the Greenfield Subtractor with no proof of actual community benefits making projects on forested land and open spaces that much more attractive. Any Community Benefits Adder should be based on proven community benefits not a community engagement process.

Projects that receive the Greenfield Subtractor should be ineligible to receive the Community Benefits Adder. The Community Benefits Adder should be eligible for all projects that do not receive the Greenfield Subtractor regardless of size or whether they are ground-mounted.

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