

BERKSHIRE REGIONAL PLANNING COMMISSION
1 FENN STREET, SUITE 201, PITTSFIELD, MASSACHUSETTS 01201

TELEPHONE (413) 442-1521 · FAX (413) 442-1523
Massachusetts Relay Service: TTY: 771 or 1-800-439-2370
www.berkshireplanning.org

KYLE HANLON, Chair
JOHN DUVAL, Vice-Chair
SHEILA IRVIN, Clerk
MALCOLM FICK, Treasurer

THOMAS MATUSZKO, A.I.C.P.
Executive Director

September 27, 2019

Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attn: Alex Strysky
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: SMART 400MW Review and Straw Proposal

Dear Secretary Theoharides:

The Berkshire Regional Planning Commission (BRPC) is pleased to submit comments on the 400MW Review and Straw Proposal presented by the Department of Energy Resources (DOER). BRPC appreciates the efforts of DOER to make improvements to the SMART Program. While we are supportive of solar development in general, and of the 800MW expansion, including the expanded capacity available to both Eversource West and Eversource East under one Capacity Block, we do have concerns regarding the types of projects developed. Our priorities are solar on rooftops, landfills and Brownfields. However, recent analysis indicates that 54.76% of the largest solar installations within Berkshire County are being developed on forested land alone. We are concerned that the economics favor forested land, greenspace and agricultural land and that this trend will continue. We are also concerned that the merging of the two regions in allotted capacity could have the unintended consequence of creating development pressure on the Western part of the state, especially if the adders and subtractors are not strengthened. BRPC offers the following comments based upon the topic areas that have been highlighted within the 400MW Review and Straw Proposal:

Steer Development Away from Undeveloped Spaces

BRPC is supportive of the efforts of DOER to steer development away from large scale ground mounted projects in undeveloped spaces. It is our understanding that local solar bylaws were included under Category 1 in an effort to respect local control. While we appreciate the intent, it appears that utilizing local zoning to qualify for Category 1 has been misused. We support DOER's proposed change and agree that projects on undeveloped land should receive the Greenfield Subtractor regardless of zoning.

BRPC does not believe that the increases proposed to the subcontractors for Category 2 & 3 are sufficient and the subcontractors are too low in comparison with potential adders (i.e., rooftops, Brownfields and dual-use agriculture). BRPC recommends an increase to the subcontractors for greenfield and forested land that is, at a minimum, sufficient to off-set the Community Shared Solar Adder.

Encourage Behind the Meter Systems

Behind the meter systems provide multiple benefits, including to alleviating interconnection issues and providing greater opportunities to pair solar with storage and reduce on-site demand. DOER proposes to address identified barriers by expanding the alternative on-bill credit and adjusting the value of energy calculation for behind the meter systems to incentivize behind the meter systems correctly. BRPC is supportive of efforts to remove barriers and encourage more behind-the-meter systems. However, the straw proposal is unclear with regard to how these proposed changes work when combined. It appears that standalone systems have a slightly higher monthly value in the example provided; however, it is not clear whether this gap may be larger under different scenarios. Efforts should be made to further adjust the incentive payments to result in a true incentive and not continue to result in a perverse incentive for standalone systems.

Increase Public Off-taker Adder

BRPC supports efforts to off set the cost associated with building projects on public land by increasing the public off-taker adder, provided the public land is not open space, recreational or forested land. However, it is unclear whether the increase of \$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. More information is needed to determine whether the increase is sufficient to result in positive change.

Broaden Dual Use Agriculture

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, it is unclear whether farmland would qualify as a dual use system if it has not been enrolled in Chapter 61A within the last five years *and* does not meet the definition of important agricultural farmlands. There is a significant amount of farmland appropriate for dual use systems that would not fall into either of these categories. We recommend that alternative language be considered and that agriculture is defined by yield and the viability of continued agricultural use rather than the proposed definition of important agricultural farmlands.

Increase Low Income Benefits and Participation

BRPC appreciates DOER's efforts to increase low income participation and understands the difficulty posed by utilizing the R-2 Rate. However, BRPC questions the use of EJ criteria over established low-income thresholds. Although it is acknowledged that older homes and rental properties are issues to low income participation, it does not appear that DOER has proposed any changes to address these barriers. Including roof repair within the total project cost for solar installation and making funds available for improvements to roofs to allow for solar installation would be first steps to increase participation. Providing incentives for landlords and ensuring that a portion of the incentive is passed on to tenants could begin to address the low-income renter population.

BRPC supports the encouragement of solar plus storage, the strengthening of consumer protection standards, adjustment of rules for replacement systems, and adjustments to community shared solar as proposed. In addition, BRPC is concerned that interconnection fees have been a significant barrier

within Berkshire County. We recognize that encouraging behind the meter systems and solar plus storage projects may address some issues with regard to interconnection fees. However, we encourage DOER to examine this issue more thoroughly to better address this issue for all projects.

On September 5, 2019 the BRPC Executive Committee authorized the Regional Issues Committee to submit comments to EOEEA. These comments were approved by the Regional Issues Committee at their meeting on September 25, 2019.

Sincerely,

Thomas Matuszko, AICP
Executive Director