



October 11, 2018

Governor Charlie Baker
24 Beacon Street
Office of the Governor
Room 280
Boston, MA 02133

Re: Solar Generation as a Percentage of Massachusetts Consumption

Dear Governor Baker:

The creation and rollout of the SMART program is an example of good government, and you should take pride in the manner in which DOER sought industry and stakeholder input in an effort to establish a sustainable solar program demanded by the legislature. This is not an empty compliment. My companies have been doing business in the Commonwealth since 1979, and as a businessperson, I have often felt that I was dealing with a kind of undercurrent akin to a Troop E and MBTA parking lot revenue management problem. So, thank you for attracting and retaining good people in place to innovatively create and implement good solar public policy.

The good news is that, because Massachusetts has managed the SREC I and II programs in a consistent and reliable manner, investors have confidence to invest in Massachusetts's solar projects. The bad news is that because of that confidence, the 1600 MW SMART program, which has taken eighteen months to create, will nearly be oversubscribed before it starts in National Grid and Unitil territories.

While it may be expected that a nascent industry will have fits and starts due to being a new, disruptive change from the traditional energy market, the choppy transitions between SREC I and II, combined with the on-again, off-again availability of net metering, has been brutal on small and medium-size companies trying to build a solar business in Massachusetts.

Larger companies simply move to another state, but in Massachusetts, small and medium-size companies are very heavily impacted by a lack of steady and consistent solar policy. Businesses see future demand due to legislated renewable compliance obligations, but they are unable to access this demand, and dependably build a business around it, because of choppy policy implementation. Among small and medium-size businesses, there is definitely a feeling of "Here we go again..." as the SMART program is oversubscribed within months of opening.

Designating that twenty percent (25%) of electricity generation in Massachusetts will come from solar PV coupled with storage by 2030 is preferable to expanding the existing program by another 1,600 MW. This mandate will give small and medium-size businesses a clear path to grow, employ people and make an increased impact on the Massachusetts economy through 2030.



Great cities like Fitchburg will not be shut out of developing solar projects if Massachusetts is focused on achieving a percentage of its electricity from solar as opposed to a finite 1,600 MW program with each utility sharing a portion of that program based upon their percentage of supply. Once the SMART portal opens, within a week or a couple of months, the Unitil allotment under SMART will be developed, thereby locking out Fitchburg from further development for years.

DOER acknowledges that the price suppression effect of solar generation lowers the wholesale cost of energy, so ratepayers' overall cost will not be paying for this transition. These cost savings are in addition to other value of solar benefits.

Planning for compliance of the Green Communities Act, a new RPS commitment of 2% per year until 2030, Kane vs. DEP, system planning within ISO-NE, integration of energy storage within ISO-NE, Smart Grid planning by the utilities will be greatly enhanced by a commitment to install 25% of solar generation by 2030.

With all of the compliance obligations that the Governor's office is charged with managing, if it is within the authority of your office to establish a solar policy that states that 25% of Massachusetts electricity consumption shall be supplied by solar generation by 2030, you should do so and keep the jobs, careers and energy generation in Massachusetts.

Otherwise, the Baker Administration should request that the legislature adopt this policy as a measure of meeting the compliance obligations passed by the legislature as well as maintaining a sustainable solar industry in Massachusetts.

Announcing this program after the SMART portal is open on November 26, 2018 would give a clear signal to the industry, the investor and finance communities, and other stakeholder groups that solar in Massachusetts is here to stay as an integral part of our economy.

Thank you for your consideration.

Best Regards,

A handwritten signature in black ink, appearing to read "Doug Pope", written over a light blue horizontal line.

Doug Pope
President

