March 31, 2020

Mr. Patrick C. Woodcock
Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Commissioner Woodcock:

The Coronavirus (COVID-19) pandemic has created unprecedented change throughout the United States. The undersigned parties want to express our profound gratitude for Governor Baker’s leadership and response to the COVID-19 crisis. In the middle of a public health emergency, it’s difficult to think about anything besides keeping everyone safe. However, as you know we also need to look ahead at the potential economic effects of this crisis and its impact on the Commonwealth’s clean energy goals; taking simple steps in the near-term can help blunt the negative long-term impacts.

We are closely monitoring the outbreak of COVID-19, its impact on the American workforce and effects to the global supply chain. Unfortunately, the COVID-19 pandemic is taking a toll on the solar industry like many others in Massachusetts and across the country. For example, SEIA is getting reports from our members around the nation about supply chain disruptions, project delays, sales challenges, challenges with signing up subscribers for community solar projects, layoffs, furloughs and more.

Put simply, solar companies are already feeling the effects of these dramatic market disruptions. The COVID-19 crisis is already threatening many solar jobs and investments at a time when we need them most.

As you consider steps to respond to COVID-19 and stimulate the economy, we ask that you extend Solar Massachusetts Renewable Target Program (SMART) reservation period for Statements of Qualification to help stabilize the solar industry and allow distributed generation projects to move forward.

We respectfully request that DOER immediately issues guidance on extending the SMART reservation period such that projects demonstrating a disruption would have their initial
reservation period extended by at least 6 months, with the possibility of additional extensions based on changing conditions.

We would suggest two possible ways to execute an extension: (1) Our preferred option, DOER could issue a blanket 6-month SOQ extension to all projects, while allowing firms who are able to do so to move forward more quickly. The advantages to this approach include providing certainty to solar project financing partners that extensions would be granted, clarity for developers, and administrative ease for all parties. Alternatively, if necessary, (2) DOER could specify the categories of documentation that would be accepted to show COVID-19 related impacts and justify the reason for the extension. The advantage to this approach would be ensuring that extensions were indeed related to the virus disruption. Upon receipt of documents, we recommend DOER automatically grants an extension. Under the second method, DOER could accept documents such as the following:

a. Force majeure notices from Engineering Procurement and Construction firms;
b. Force majeure notices from the Electric Distribution Companies;
c. Notices from vendors regarding equipment delivery delays; or
d. Documents providing proof that local government inspection and permitting have been suspended.

Furthermore, we are concerned that prohibitions on in-person sales and general consumer distraction will impact the industry’s ability to meet regulatory deadlines, such as the requirement that community solar projects document 90 percent subscription at PTO in order to claim a community solar adder. One solution may be to shift this requirement to within 12 months of PTO, which would allow solar construction and jobs to recover while giving consumers the time to regain confidence and for the salesforce to ramp up again after the crisis abates.

We appreciate the Commonwealth’s response to the unprecedented challenge of the COVID-19 pandemic. We look forward to working together in these trying times to maintain progress toward the Commonwealth’s clean energy goals.

Thank you for considering these recommendations. We will be following up by phone shortly and please contact David Gahl dgahl@seia.org with any questions about these requests in the meantime.

Respectfully submitted,

/s/
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Solar Energy Industries Association

/s/
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/s/
Mark Sandeen, President
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/s/
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/s/
Mark Sylvia, President
Solar Energy Business Alliance of New England

/s/
Nathan Phelps, Regulatory Director
Vote Solar

cc: Eric Steltzer, Director, Renewable Energy Division