



July 5, 2022

The Honorable Jeffrey N. Roy
House Chair
Joint Committee on Telecommunications, Utilities & Energy
State House Room 43
Boston, MA 02133

The Honorable Tackey Chan
House Chair
Joint Committee on Consumer Protection and Professional Licensure
State House Room 42
Boston, MA 02133

The Honorable Bradley H. Jones, Jr.
House Minority Leader
Republican Leaders Office
State House Room 124
Boston, MA 02133

Re: Conference Committee of H.4524/S.2842 – SMART Pollinator Adder Reinstatement

Dear House Conferees,

I write today in strong support of comments submitted on behalf of the solar and renewable energy industries by the New England Clean Energy Council (NECEC) dated June 16, 2022 and to thank you for your diligent work in reconciling these groundbreaking pieces of climate and clean energy legislation.

I would also like to take this opportunity to provide additional background, beyond what was provided in the NECEC comment, on the need to restore the pollinator adder to the Massachusetts Solar Renewable Target Program (SMART). Language to restore the adder is included in the legislation currently under your review in Section 48 of S.2842.

As you know, in December 2021 the Massachusetts Dept. of Public Utilities disallowed utility cost recovery for the pollinator SMART adder. This sudden and unexpected change now disincentives solar projects from incorporating pollinator habitats and their important environmental benefits. This change is particularly troublesome because it is retroactive and can have significant financial impacts on projects already in operation or which have already been financed.

As a company, Nexamp was proud to include pollinator habitat in 10 of our projects which received the pollinator adder. Of these projects, 5 are already in operation. We gladly made additional investments in these projects to comply with the pollinator adder requirements because of the environmental benefits, and because many of these costs were offset by the adder. As you know, to receive the adder there are considerable requirements including providing a development plan, meeting certification criteria, selecting approved plant species, and meeting maintenance



requirements. Unfortunately, unless the adder is restored, existing projects will be financially impacted and future projects are unlikely to include these crucial habitats.

Nexamp is a veteran-founded, vertically integrated clean energy company that provides comprehensive solar and energy storage solutions and is the largest owner-operator of community solar in the country. Here in the Commonwealth, we have 280MW of solar installed and in development, representing 74,000 metric tons of CO2 avoided. We also serve thousands of commercial and residential customers in the Bay State, including low-income residents who benefit from our clean, affordable power.

Nexamp appreciates the support the Massachusetts legislature has shown to the solar industry and to its commitment to clean energy and environmental sustainability in the commonwealth over many years, including the bills currently under your review.

We respectfully ask for your consideration of this request to restore the pollinator adder, to not only protect endangered bees and pollinator populations, but also to sustain the healthy environmental ecosystems they support.

Kind regards,

A handwritten signature in black ink, appearing to read "Kelly Friend".

Kelly Friend

VP, Policy and Regulatory Affairs