



July 21, 2026

Dear Chair Barrett, Chair Cusack, and Honorable Members of the Conference Committee,

On behalf of the Massachusetts Distributed Energy Resources (DER) coalition, thank you for your service on the Conference Committee reconciling H.5175 and S.3166. Our coalition of experts brings together solar and storage developers and industry associations, conservation organizations, environmental justice groups, organizations representing consumer interests and ratepayers, and other grassroots organizations united by a shared goal: an affordable transition to clean energy for every Massachusetts household.

We appreciate the thoughtfulness both chambers have brought to their bills, and the House and Senate's shared recognition that distributed energy resources (local solar, storage, and smart grid technology) are essential tools for [lowering costs](#) and [modernizing the grid](#). As you work to reconcile differences between the two versions, we write to highlight the provisions we believe matter most for Massachusetts ratepayers, and to urge specific choices where the chambers diverge.

This letter lists 9 recommendations, with our top priorities being the first three on the list. Our recommendations are grounded in these core questions:

- Does this provision lower costs?
- Does this provision help our clean energy economy?
- Does this provision expand access to energy affordability solutions for the people who need it most?

Chief among these opportunities: Massachusetts utilities are on track to invest billions of ratepayer dollars in new grid infrastructure over the coming decade to meet rising peak demand projections. A significant share of that projected capacity need could instead be met by privately financed DERs and Virtual Power Plants (VPPs) at a fraction of the cost – but only if the Legislature requires utilities to consider and adopt these cheaper alternatives before defaulting to new capital-intensive construction. This is a profound lever for reducing ratepayer costs, and it's why we urge the Conference Committee to prioritize the accountability and cost-recovery provisions described in Recommendation 2.

The priorities we discuss are instrumental to unlocking private investment at the scale needed to reduce ratepayer costs and meet critical grid modernization requirements. We would be happy to discuss these recommendations in greater detail or to answer any questions that may arise during your deliberations.

Top Priorities:

- **Adopt Smart Permitting**
- **Using DERs to Lower Peak Demand**
- **Streamlining Interconnection Reforms**

Recommendation 1: Adopting Smart Permitting

Installing home solar is one of the few tools MA families have to confront high energy costs. But slow and inconsistent permitting adds thousands of dollars in costs and months to project timelines. Smart permitting is one of the most direct ways the Legislature can lower costs for families installing solar and batteries. Both H.5175 and S.3166 establish a statewide automated permitting platform, which we strongly support. We urge the Conference Committee to adopt the House language: H.5175 §25 is generally stronger and clearer. It succinctly captures the details of the smart permitting platform in the requirements section, whereas the Senate version contains two conflicting descriptions in the definitions and requirements sections. The DER coalition recommends using the House version of the alternative compliance pathway. Both versions allow municipalities to opt into their own platform, but the Senate version gives municipalities a secondary alternative and even more time - up to 24 months - to delay implementation, unnecessarily preventing families from accessing smart permitting as soon as possible. We recommend including Section 72 of the House bill, which requires municipalities to reduce permit fees after two years to reflect the cost savings of the state platform, ensuring automation savings are passed on to households. In addition to smart permitting, the final bill should give families the option for remote inspections via photo or recorded video, which [research](#) shows are faster, safer, and more cost-effective than in-person field inspections.

Recommendation 2: Using DERs to Lower Peak Demand

Both the House and Senate bills direct utilities to use DERs to reduce ratepayer costs caused by peak grid demand in their electric-sector modernization plans, or ESMPs (**S.3166, §69 and H.5175, §38**). Utilities will be required to optimize DERs to defer or avoid grid investments; set 5- and 10-year peak load reduction targets; and enable third-party load management and VPP services. This is important groundwork that could defer or avoid billions in peak grid capacity investments otherwise charged to ratepayers.

The load management plans are necessary but not sufficient. Rising demand is converging with an energy affordability crisis, and ESMPs need enforceable standards that channel DERs and VPPs toward capacity solutions whenever they're cheaper than traditional capital-intensive grid upgrades. Without binding mechanisms, load management plans risk remaining nothing more than promises on paper.

Two provisions in the Senate bill are critical to realizing the plans' practical benefits:

- First, the creation of a comprehensive distribution system planning and cost-recovery framework (**S.3166, §70**, also reflected in **H.4144, §30**), which authorizes the DPU to *require* using DERs and VPPs that mitigate grid investment costs to ratepayers, and requires utilities to get more use from existing infrastructure – for example, using VPPs

to shift load away from peak hours. Without this, utilities remain incentivized to build new infrastructure instead of using DERs to make the existing grid more cost-effective.

- Second, the Senate bill positions the Mass Save successor program to mitigate peak demand costs by including load management, electrification, and demand response as eligible demand resources for funding (**S.3166, §10 and §16**). These changes transform MassSave into a vehicle that incentivizes private investments in customer-owned resources that avoid costlier infrastructure investments – while the House bill, in contrast, simply cuts the program's funding.

Together, these provisions establish enforceable targets and the funding to meet them, and we strongly encourage the Conference Committee to adopt both.

Recommendation 3: Streamlining Interconnection Reforms

Interconnection (the process by which a solar, storage, or other DER project connects to the grid) is cited as the largest [source of delay and uncertainty](#) for a clean energy project. Streamlining and modernizing interconnection is one of the most direct ways the Legislature can lower costs and speed the deployment of affordable clean energy. The flexible interconnection provisions in both **S.3166 (§88 and §101)** and **H.5175 (§54 and §79)** are essential and we support the inclusion of a similar provision in the final bill. **S.3166 §90** also advances elements of residential interconnection reform through a common application, which we support, but there is one critical gap that should be filled in: transparency and accountability around timelines. We urge the Conferees to address this gap in the final bill by adding a provision that improves transparency and accountability around utility interconnection timelines, process changes, and application decisions.

Recommendation 4: Supporting Mass Save and ConnectedSolutions

S.3166 updates the existing Mass Save program by creating a statewide building decarbonization and energy efficiency investment plan. Mass Save – the Commonwealth's nationally recognized energy efficiency program – saves ratepayers [\\$3.51 for every \\$1 invested](#) in the program. It can be strengthened by incorporating S.3166's provisions regarding decarbonization. Among other things, that would ensure continued funding for the ConnectedSolutions program, the Commonwealth's virtual power plant (VPP) program and a nation-leading program exemplifying the value VPPs bring to the grid. VPPs orchestrate distributed energy resources across thousands of homes and businesses. ConnectedSolutions helps make the grid more reliable and affordable for all ratepayers by freeing up and exporting vast amounts of energy when the grid is in need. For example, in 2025, the ConnectedSolutions program [provided](#) approximately \$51 million in direct ratepayer benefits.

Savings from the Mass Save program are only expected to increase in future years as the program makes important strides in reaching households with high energy burdens. We applaud the Senate for not proposing any cuts in funding for the current Mass Save program or the future statewide building decarbonization and energy efficiency investment plan. We urge the conference committee to preserve full funding of this program and its equity commitments, and

to ensure that decarbonization work, including the ConnectedSolutions program, remains fully supported.

Recommendation 5: Maintaining Alternative Compliance Payments

Alternative Compliance Payments (ACPs) are fees paid by utilities when they fall short of their renewable energy obligations. The Department of Energy Resources (DOER) reinvests these funds in clean energy programs, many of which specifically support low-income communities. Diverting ACP funds away from these programs would [reduce the resources available](#) to bring solar and other clean energy benefits to the households that need them most. We support the Senate's approach, which does not mandate this diversion.

Recommendation 6: Authorizing Plug-In Solar

Plug-in solar is one of the only ways a renter, condo owner, or anyone else without access to rooftop solar can [benefit from solar savings](#). For a bill built around affordability, this is exactly the population it should reach. We urge the Conference Committee to adopt the House's definition of "portable solar generation device" (H.5175 §19) as the operative framework, strengthened with two small additions drawn from S.3166: First, a small system exemption (**§82 subsection C**); and second, protections against unreasonable restrictions on installations (**§82, subsections H and I**). These two additional provisions keep plug-in solar [safe](#) and accessible to the households the technology is designed to serve, turning plug-in solar into a real path to direct savings for every household.

Recommendation 7: Facilitating Solar for Municipalities

Schools, public buildings, and municipal land can all generate solar power that directly offsets public energy costs, but current law caps how much net-metered generating capacity a municipality can host. Both chambers thankfully recognize this problem, but they take different approaches to solving it: H.5175 (§ 48) raises the cap from 10 megawatts to 20 megawatts, while **S.3166 (§77-78)** eliminates the cap entirely. We urge the Conference Committee to adopt the Senate's approach. Massachusetts needs all the clean, low-cost power it can bring online, and an outright removal of the cap, rather than a fixed ceiling that will eventually need revisiting, gives municipalities the flexibility to scale solar and [lead](#) on affordable power.

Recommendation 8: Facilitating Solar for Public Affordable Housing

Rooftop solar on public properties, including public affordable housing, directly lowers operating costs for housing authorities, the residents they serve, and by extension, taxpayers. We're pleased that both chambers addressed a technical concern getting in the way: **H.5175 (§10A-10C)** and **S.3143 (§79)** fix a procurement barrier so that public entities can directly hire DCAMM-certified solar contractors to build small projects on a per-building basis without needing to engage in a prohibitively costly public solicitation procedure. We urge the Conference Committee to keep this important fix in the final bill.

Recommendation 9: Investigating a Modernized State Tax Credit

The loss of federal clean energy tax credits is already affecting solar deployment in the Commonwealth. Massachusetts can help close that gap by modernizing its state solar tax credit, including by evaluating a higher cap and refundability for low- and middle-income residents. **S.3166 §133 (a)(viii)** is intended to investigate that approach: to study how best to support small solar installers and facilitate access to incentives where they are needed most given current federal headwinds. As incorporated into the bill, this provision references a specific working group, but offering a narrower, more targeted investigation would ensure that future policy recommendations are fiscally responsible while minimizing the administrative burden on state agencies. We recommend moving the provision to make it more effective, rather than incorporating it into a consumer protection working group with an unrelated policy focus. We would be happy to meet with the Committee or provide any additional information that would be helpful.

Thank you for your attention and consideration. We hope to serve as a resource as you finalize our state's energy bill.

Sincerely,

The Alliance for Climate Transition (ACT)
 Alternatives for Community & Environment (ACE)
 Boston Community Solar Coop
 Ceres
 Dayenu: A Jewish Call to Climate Action
 Economy and Environment (E2) - New England
 EnergySage
 Greenfield Solar
 GreenRoots
 Kearsarge Energy
 350 Mass
 Mass Audubon
 MassSolar
 Mothers Out Front Massachusetts
 Northeast Energy Efficiency and Electrification Council

Permit Power
 Powertown
 Resonant Energy
 ReVision Energy
 Rewiring America
 Sierra Club Massachusetts
 Solar Design Associates
 Solar Energy Business Association of New England (SEBANE)
 Solect Energy
 Solar United Neighbors Action
 Sunwealth
 Third Act MA
 TSK Energy Solutions LLC
 Vote Solar



Enclosed as Appendix: [Grid Action Report – July 4th Heat Wave](#) (Acadia Center, July 6, 2026)