



The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

MEMORANDUM

TO: D.P.U. 25-117 Distribution List; Distributed Generation Distribution List

FROM: Krista Hawley, Hearing Officer

RE: Technical Conference

DATE: October 7, 2026

CC: Peter A. Ray, Department Secretary

I. INTRODUCTION

On November 20, 2024, Governor Healey signed into law An Act Promoting a Clean Energy Grid, Advancing Equity and Protecting Ratepayers, Chapter 239 of the Acts of 2024 (“2024 Climate Act” or “Act”). The 2024 Climate Act directs the Department of Public Utilities (“Department”) to investigate expanding access to net crediting solutions for Net Metering facilities and solar facilities eligible to receive bill credits under any programs established pursuant to Section 11 of Chapter 75 of the Acts of 2016, i.e., the SMART Program.¹ St. 2024, c. 239, § 106.²

¹ The Legislature directed the Department of Energy Resources (“DOER”) to establish a stable, statewide solar incentive program that would “encourage the continued development of solar energy generating resources.” St. 2016, c. 75, § 11(b). Pursuant to this directive, DOER established the Solar Massachusetts Renewable Target (“SMART”) Program at 225 CMR 20.00, and most recently SMART 3.0 Program at 225 CMR 28.00.

² The full text of Section 106 of the Act states that:

Notwithstanding any general or special law, rule, regulation or order to the contrary, the department of public utilities shall investigate expanding access to

On October 7, 2025, the Department issued Expanding Access to Net Crediting Solutions for Net Metering Facilities and Solar Facilities, Vote and Order, D.P.U. 25-117 (2025). The Department docketed this investigation as D.P.U. 25-117. For a complete procedural history of this matter, please see the Hearing Officer Memorandum issued July 6, 2026.

II. TOPICS AND SCHEDULING FOR ADDITIONAL TECHNICAL CONFERENCE

In the July 6, 2026 Hearing Officer Memorandum (at 4-5), the Department announced that, based on the discussion during the February 6, 2026 technical conference and additional discussions with the stakeholders, the Department would convene an additional technical conference to discuss the following issues: (1) costs and timeframe associated with implementing the Section 106 and Section 107³ approaches; (2) the customer transparency that would be provided through the two approaches; (3) the allocation of the administrative cost savings that should result from the implementation of a net crediting/consolidation billing

net crediting solutions for net metering facilities and solar facilities eligible to receive bill credits under any programs established pursuant to section 11 of chapter 75 of the acts of 2016. Such net crediting solutions may facilitate the allocation of credits between owners of facilities and customers, including any payment mechanism that requires an electric distribution company, at the request of a host customer or eligible facility to: (i) include the monthly subscription charge of a host customer or eligible facility on the customer's bills; and (ii) remit payment for those charges to the host customer or eligible facility. The department shall consider whether an electric distribution company may require a fee for a host customer or eligible facility that uses net crediting.

³ The full text of Section 107 states that:

Notwithstanding any general or special law, rule or regulation to the contrary, the department of public utilities, in consultation with the department of energy resources, shall: (i) amend any applicable rules, regulations and tariffs to permit the transfer of credits from an alternative on-bill credit generation unit, as defined by regulations of the department of energy resources, to customers of any electric distribution company located in the commonwealth; and (ii) require the electric distribution companies to implement consolidated billing on Alternative On-Bill Credit ("AOBC") Low Income Community Shared Solar ("LICSS") generation units. In implementing said consolidated billing, the electric distribution companies shall apply the net value of the bill credit directly to customer's accounts and remit the developer or owner portion of the payment directly to the developer or owner. The net value of the bill credits the electric distribution companies would apply to customer accounts may be calculated in a manner determined by the department. This is akin to the billing and payment approach used by Eversource in its Community Solar Access Program ("ECSAP"). St. 2024, c. 239, § 107.

approach; and (4) the ratepayer impacts that would result from shifting the risk of non-payment to ratepayers. Additional information on these issues is presented to inform discussion at the technical conference.

1. Implementation costs. Department staff met with the electric distribution companies (“EDCs”)⁴ to discuss their projections of the costs and timeframe associated with implementing the Section 106 and Section 107 approaches. The EDCs will present their projections at the technical conference. The Department requests that the EDCs file their projections and any presentations to the public docket prior to the technical conference.
2. Transparency. Customer transparency related to bill credits and subscription fees attained under the existing approach (two-bill) must be maintained or improved under a net crediting/consolidation billing approach. The Department requests that the solar developer community work collaboratively to present information at the technical conference regarding the transparency that currently is provided by solar companies to their customers.⁵ Staff seek to discuss the extent to which such transparency could be attained under the Section 106 and Section 107 approaches.
3. Allocation of administrative cost savings. It is reasonable to assume that community shared solar (“CSS”) developers will realize significant administrative cost savings under a net crediting/consolidation billing approach. The savings could be passed through to customers by (1) increasing the minimum discount requirements or (2) decreasing the SMART compensation rate adder for these facilities. The Department requests that the Department of Energy Resources present information at the technical conference on the revisions that it would need to make to its SMART 2.0 Regulations and its SMART 3.0 Regulations and associated Guidelines to implement each approach.⁶ Department Staff seek to discuss the pros and cons of each approach, as well as other approaches that may address this issue.

⁴ The EDCs are Fitchburg Gas and Electric Light Company d/b/a Unitil, Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid, and NSTAR Electric Company d/b/a Eversource Energy.

⁵ The solar developer community may contact Hearing Officer Krista Hawley with any questions regarding this request.

⁶ DOER should contact Hearing Officer Krista Hawley with any questions regarding this request.

4. Ratepayer impacts. Department staff has met with the EDCs to discuss their projections of the costs that ratepayers would incur if the risk of non-payment of the subscription fee was shifted from CSS developers to ratepayers. The EDCs will present their projections at the technical conference. The Department requests that the EDCs file their projections and any presentations to the public docket prior to the technical conference

The Department will hold a hybrid technical conference on Tuesday, October 27, starting at 9:30 a.m. The in-person session will be at the Department's office, One South Station, Boston, Massachusetts. For questions, please contact Hearing Officer Krista Hawley at krista.hawley@mass.gov.

For those who wish to participate remotely, zoom information is below.

When: Oct 27, 2026 09:30 AM Eastern Time (US and Canada)

Topic: DPU 25-117 Technical Session

Join from PC, Mac, iPad, or Android:

<https://us06web.zoom.us/j/87687810320>

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