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July 2, 2025

Senator Michael Barrett & Representative Mark Cusack  
Co-Chairs, Joint Committee on Telecommunications, Utilities, and Energy  
Room 312-b or 43, State House, Boston, MA 02113

### **RE: A Better City's Comments on H.4144, An Act Relative to Energy Affordability, Independence, and Innovation**

Dear Chairs Barrett and Cusack:

On behalf of A Better City's 130 member businesses and institutions, thank you for the opportunity to provide comments on H.4144, *An act relative to energy affordability, independence, and innovation*. A Better City appreciates the Healey-Driscoll Administration's leadership and strongly supports many provisions of this bill to help protect ratepayers and promote an affordable transition to a clean energy economy. Particularly during a summer when Boston recorded its hottest June day in 14 years, and when energy burdens are making access to cooling in hot summer months (and heating in the winter) increasingly burdensome, this bill is necessary to support the clean energy transition and to improve our region's economic competitiveness.

A Better City supports H.4144 and urges the Committee to advance this bill. A Better City also offers the following recommendations for consideration in bill amendments: incentivize rather than require SMART program participation for behind-meter solar; create incentives to retrofit and decarbonize the building sector; fast track interconnection projects in stressed load zones; add district energy representation to the building decarbonization and energy efficiency advisory council; and explore the feasibility of establishing a statewide clean power prescription program.

Thank you for your ongoing leadership and please reach out to Isabella Gambill ([igambill@abettercity.org](mailto:igambill@abettercity.org)) with any comments or questions.

Sincerely,

*Y.L. Torrie*

Yve Torrie  
Director of Climate, Energy, & Resilience  
A Better City

Cc: Secretary Tepper, Undersecretary Antos, Undersecretary Judge, Director Melissa Lavinson



### **Incentivize Rather than Require SMART Program Participation for Behind-Meter Solar**

A Better City appreciates the intent to support the SMART solar program in requiring all behind-the-meter solar projects to apply for SMART. However, community solar advocates have raised concerns about this becoming a hindrance to some solar projects, at a time when we need to be ramping up intentional solar development. Rather than requiring behind-the-meter solar projects to participate in the SMART program, A Better City suggests exploring alternatives to incentivize, not require, SMART. In addition, many municipalities are developing Building Performance Standards that require building owners to retire the RECs from solar projects for GHG emissions reduction compliance. As RECs from the SMART program go to the utilities, this can create a massive compliance burden for building owners. Some municipalities, like Boston, have provided an exemption for building owners under SMART. However, each municipality is developing unique building performance standards and there is concern that without a requirement to exempt building owners using the SMART program in any building performance standard across the state, that an undue burden will be placed on them.

- **A Better City recommends amending the language in H.4144 to incentivize SMART program participation for behind-the-meter solar projects, rather than requiring all solar projects to do so. We also recommend exempting building owners as part of a municipality or state building performance standard from being penalized for participating in the SMART program where they cannot use the RECs for compliance.**

### **Create Incentives to Retrofit and Decarbonize the Building Sector**

A Better City appreciates the many provisions of H.4144 to address energy bills but believes that more needs to be done to encourage deep energy retrofits of existing buildings, the second largest source of emissions statewide. A Better City recommends providing incentives to retrofit and decarbonize the building sector, which would also help to lower energy costs and usage. We have heard great reports about a program in New York, the [Empire Building Challenge](#) offered by NYSERDA and recommend Massachusetts consider establishing a similar Commonwealth Building Challenge.

- **A Better City recommends including incentives to retrofit and decarbonize existing buildings, and establishing a Commonwealth Building Challenge similar to [NYSERDA's Empire Building Challenge](#).**

### **Fast-Track Interconnection Projects in Stressed Load Zones**

A Better City appreciates the many bill provisions that address delays in clean energy interconnection to the electric grid and the flexible interconnection provision. In addition to such interconnection reforms, A Better City also recommends exploring the opportunity to fast-track interconnection projects that are located within over-burdened load zones, including environmental justice neighborhoods, to help prevent blackouts and brownouts in periods of peak energy demand. For example, this past week's heat wave saw communities in Roxbury and other environmental justice neighborhoods losing power and AC access during a dangerous heat dome, and such neighborhoods would benefit from fast-tracking interconnection for clean energy and distributed energy resources.

- **A Better City supports H.4144's flexible interconnection provision and recommends exploring the opportunity to fast-track interconnection projects in overburdened load zones in Boston and beyond.**



### **Add District Energy Representation to Building Decarbonization and Energy Efficiency Council**

A Better City appreciates the effort to rename the Energy Efficiency Advisory Council to more adequately reflect the need to tackle both energy efficiency and decarbonization. To support the promotion of clean district energy solutions, A Better City suggests adding a seat for a district energy representative.

- **A Better City recommends adding a seat for a district energy solutions representative to join the Building Decarbonization and Energy Efficiency Council.**

### **Explore the Feasibility of Establishing a Statewide Clean Power Prescription Program**

In order to help energy burdened patients access clean and affordable energy, Boston Medical Center (BMC) established a [Clean Power Prescription Program](#) pilot that enables doctors to prescribe clean energy credits from BMC's community solar array, to energy burdened patients. Given the transformative nature of such a program, A Better City suggests designing and implementing a statewide program for clean power prescriptions, in which community solar credits could be donated and pooled, to then be re-distributed to energy burdened patients across the state.

- **A Better City recommends exploring the feasibility of designing and implementing a statewide clean energy prescription program, modeled after Boston Medical Center's [Clean Power Prescription Program](#), to help energy burdened patients that cannot afford to pay for heating and cooling to access clean and affordable electricity. Such a program could act as a statewide community solar credit bank to which community solar owners could donate a portion of their credits, which then could be re-distributed to energy burdened patients across the state.**