

2024 Clean Peak Energy Standard Review Stakeholder Questions

March 25, 2024

In order to evaluate potential amendments to the Clean Peak Energy Standard (CPS) (225 C.M.R. 21.00), the Department of Energy Resources (DOER) seeks stakeholder feedback on the following questions.

The deadline for submitting written comments on the questions for the CPS review is May 3, 2024 by 5pm EST. Written comments should be submitted to DOER.CPS@mass.gov with "CPS Review Comments" in the subject line. As an alternative, the public may submit written comments via mail to the Department of Energy Resources, 100 Cambridge Street, 9th Floor, Boston, MA 02114, attention Samantha Meserve. Please be advised that there may be delays in receiving written comments via the mail.

If you have any questions on these updates, please contact DOER.CPS@mass.gov.

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1. How could the Clean Peak Energy Standard (“CPS”) Program be improved to better contribute to achievement of the 2050 GWSA mandates? Please include details and any supporting data and analyses.
2. What are the costs and benefits of participating in the CPS program?
3. Has the CPS incentive had an impact on the decision of system owners to invest in CPS eligible technologies? Why or why not?
4. Please describe the portfolio of projects you have that you anticipate are within 4 years of commercial operation and that you intend to enroll in CPS. Include as many details as possible, including your projects' anticipated Commercial Operation Dates, power and energy capacities, interconnection level (i.e., front-of-the-meter, behind-the-meter), durations, technology types, intended use cases, locations, and any other pertinent information.
5. Are the CPS Resource eligibility criteria appropriate? If any criteria pose a barrier, please describe and provide recommended mitigation strategies.
6. Are CPS application processes and requirements clear? Is communication between applicants, the CPS Program Administrator, and DOER clear and effective? Please describe any improvements you believe could be made to the CPS application process.
7. Are CPS Program compliance requirements clear prior to program enrollment? If any requirements are unclear, please describe and recommend clarifying language.
8. What modifications to CPS Multipliers, Minimum Standard, ACP Rate, and Seasonal Peak Periods as currently set forth in 225 CMR 21.00, if any, are needed? Please describe in detail and provide any supporting data and analyses.
9. Please provide any comments on the necessity of, Resource eligibility for, and structure of a CPEC procurement. If in favor of a CPEC procurement, please comment on its timing, in particular if it should occur in parallel with the CPS Review or after, and any considerations DOER should make about the CPEC procurement in light of the CPS Review.
10. How well does the CPS align with other Commonwealth programs, such as SMART and ConnectedSolutions, to incentivize the deployment of peak reducing resources, and how could program alignment be improved?
11. Are there any Commonwealth policies (e.g., renewable energy goals, land use priorities, codes and standards, etc.) that you believe the CPS program inadvertently conflicts with? Please describe any potential modifications to CPS that would alleviate these conflicts.

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12. Please describe any factors outside of the CPS Program that impact the ability of Resources to enroll or participate in the CPS Program, and any mitigation recommendations you have for DOER.
13. Is there any additional information you believe DOER should consider in its 2024 CPS Review?
14. Would any Clean Peak Resources or specific use cases for such Resources be better incentivized by a different program than CPS? If yes, please describe the proposed program and justify why the particular Clean Peak Resources and associated use cases would be better incentivized by such a program, with particular attention paid to added ratepayer benefits.