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CPS Review Comments: FirstLight

FirstLight appreciates the opportunity to provide responses to several questions posed by the Department regarding the Clean Peak Standard review. We hope the following offers helpful insight as to our experience as a leader in energy storage here in Massachusetts and New England.

Company Overview

FirstLight is a leading clean power producer, developer, and energy storage company serving North America. With a diversified portfolio that includes over 1.6 GW of operating renewable energy and energy storage technologies and a development pipeline with 4,000+ MW of solar, battery, onshore, and offshore wind projects, FirstLight specializes in hybrid solutions that pair hydroelectric, pumped-hydro storage, utility-scale solar, large-scale battery, and offshore wind assets.

Our mission and vision is to accelerate the decarbonization of the electric grid by owning, operating, and integrating large-scale renewable energy and storage assets to meet the region's growing clean energy needs and to deliver an electric system that is clean, reliable, affordable, and equitable.

FirstLight's clean energy facilities in New England produce over 690,000 MWh of emissions-free generation, reducing the region's carbon footprint by more than 780,000 tons annually. In addition to our clean energy generation facilities, we also own and operate the 1168 MW Northfield Mountain pumped hydro storage station and 29 MW Rocky River pumped hydro storage station, respectively the largest and third largest energy storage facilities in New England, 2 MW of solar PV, and 1.5 MW of behind-the-meter battery storage in Massachusetts. Our facilities represent over a billion dollars of private investment in the region, employ more than 200 people, and support our communities in Massachusetts with more than \$15 million in local property taxes every year.

FirstLight Responses

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.

A: The CPS would benefit from creating an incentive opportunity for existing storage to refurbish facilities that result in extending the operating life of the asset, as evidenced by substantial capital

investments in the facility after (a date TBD). Maintaining existing storage into the future will require substantial capital investments and such an investment is not always a given depending on market circumstances. Allowing existing storage to participate in the CPS by making such an Investment will help to prevent backsliding on its 2050 GWSA mandates through the retirement of storage assets. To prevent a flooding of the Clean Peak market, FirstLight recommends a cap of 300MW total capacity that may qualify per facility. There is precedent in New England for existing resources to participate in state programs under similar circumstances. A refurbishment provision exists within the Maine Public Utilities Commission (the "Commission") renewable portfolio standard ("RPS") as set forth in Sections 2(T)(4)(b), 3(A) and 3(B) of Chapter 311 of the Commission's rules ("Ch. 311").

Are the CPS Resource eligibility criteria appropriate? If any criteria pose a barrier, please describe and provide recommended mitigation strategies.

A: As mentioned above, allowing for the eligibility for existing storage to participate in the CPS by investing in substantial refurbishment (which results in extending the operating life of the asset would benefit Massachusetts GWSA goals and maintain its existing storage fleet.

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?

A: Historically, ConnectedSolutions scheduled dispatch windows have at times fallen outside of Clean Peak periods. A proposed solution to this would be for coordination between programs such that ConnectedSolutions scheduled dispatch hours that fall outside of the Clean Peak period also qualify for Clean Peak Credits.

Is there any additional information you believe DOER should consider in its 2024 CPS Review?

A: The refurbishment provision of the Maine Public Utilities Commission (the "Commission") renewable portfolio standard ("RPS") as set forth in Sections 2(T)(4)(b), 3(A) and 3(B) of Chapter 311 of the Commission's rules ("Ch. 311") would be a beneficial provision to examine for the reasons stated above.

Thank you for your time and consideration.

Sincerely,



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