

- 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.**

Recommendation of Voltus includes a review on the Actual Monthly Peak Multipliers, Seasonal Peak Periods, and an improvement on the accuracy and up-to-dateness of the documentation. We also recommend the DOER or MassCEC to contract a public website for key program information update and disclosure. Please find the details in our response to Question 6, 7, 8, 9, and 10.

- 2. What are the costs and benefits of participating in the CPS program?**

In 2023, Voltus successfully enrolled three resources, facilitating their participation in two demand response events held in September. The entire process, encompassing research, discussions with program administrators (MassCEC), system registration, API Key setup, and other engineering tasks for production submission, CPECs minting, trading, and transfer, required approximately 70 unique hours. Notably, this time investment excludes the hardware setup necessary for load metering and production tracking, which we estimate to require around 10 hours.

Benefitting from our customer's prior experience with Voltus, we effectively managed these tasks. Subsequently, we were able to sell our CPECs to an aggregator, resulting in additional revenue for our customer. This financial incentive serves to encourage reduced energy consumption during daily peak periods, aligning with our shared goals of sustainability and grid reliability.

- 3. Has the CPS incentive had an impact on the decision of system owners to invest in CPS eligible technologies? Why or why not?**

The existing customer portfolio that Voltus collaborates with has already made investments in CPS-eligible technologies. As we engage in ongoing discussions with potential clients, it's evident that the CPS program offers considerable value-add to their investments in CPS-eligible technologies. However, we've yet to encounter a scenario where the CPS incentive significantly impacts the decision-making process.

- 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.**

Voltus stands as a premier demand response provider with a vision to evolve into a comprehensive DER service platform encompassing various CPS-eligible technologies. Our trajectory involves continually integrating Non-ESS demand response resources into the program annually, alongside the incorporation of behind-the-meter energy storage

systems. This strategic expansion reflects our commitment to driving innovation and maximizing grid flexibility while meeting the evolving needs of the energy landscape.

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

Yes. Voltus does not experience or foresee barriers in the resource eligibility criteria.

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.

Voltus encounters significant challenges with the five-step resource application process, citing cumbersome procedures and outdated, incoherent documentation. Our registration journey began in June 2023, during which the [instructions for Non-ESS Demand Response resource registration](#) directed us to email doer.cps@mass.gov for PTS registration, a direction that persists unchanged to date. While DOER contacts swiftly redirected us to the Production Tracking System, this outdated guidance poses ongoing risks of misguiding new program applicants.

Similarly, [the SQA application process instructions on the DOER website](#) continue to advise Non-ESS DR resources to email doer.cps@mass.gov for SQA application, despite the actual registration occurring within the PTS portal. This inconsistency adds unnecessary confusion to the application process.

Throughout registration, the MassCEC team provided valuable assistance regarding program rules and reporting standards. However, discrepancies arose between their guidance and our experiences. For instance, despite being instructed by the PTS team to submit productions considering all applicable multipliers, we later received a request to revert our calculations and submit only raw production data, without the multipliers. This procedural back-and-forth significantly delayed the issuance of our CPECs, causing us to miss out on two utility procurements directly.

Moreover, we encountered substantial delays in setting up the API Key for performance tracking and reporting, exacerbated by a lack of clarity in the documentation regarding the treatment of Daylight Saving Time changes. While this issue currently does not affect Voltus' participation, given our summer-only resources, we anticipate potential complications for technology types operating year-round. Addressing these challenges is crucial for streamlining the application process and ensuring efficient program participation for all stakeholders.

7. Are CPS Program compliance requirements clear prior to program enrollment? If any requirements are unclear, please describe and recommend clarifying language.

It wasn't initially clear to Voltus that enrolled systems needed to submit production data in months when they weren't actively curtailing load or contributing renewable energy to the grid. Prior to enrollment, the PTS team advised us not to submit production data for months where we opted out of receiving CPECs. However, during actual participation, we discovered that production data submission was mandatory for inactive months, necessitating us to submit zeros for those periods.

In light of this experience, we recommend incorporating the following terms: Resources are only required to submit production data in months they wish to receive credits for. Any resources failing to submit production data by the fifth day of the subsequent month automatically opt out of crediting for the preceding month's production. By implementing these terms, clarity and efficiency in reporting requirements can be enhanced for all participants.

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.

Voltus recommends introducing more nuanced layers in the Actual Monthly Peak Multipliers. Currently, a uniform x25 multiplier is awarded for the peak hour in each month. However, Voltus asserts that the peak hours across the 12 months vary significantly in their impact on grid operation, resource planning, and decarbonization efforts. Therefore, a universal multiplier value (x25) for all 12 months may not accurately reflect these distinctions.

In response, Voltus proposes delaying the decline of the Alternative Compliance Payment (ACP) rate by 3 years, commencing in compliance year 2028 rather than the current schedule of 2025. Through discussions with various aggregators and energy suppliers, it has become apparent that the CPEC market suffers from significant undersupply, primarily due to the arduous registration process and protracted participation cycle. Naturally, the erosion of value from the program stems from the decline in the ACP rate.

Additionally, Voltus suggests widening the peak periods from 3-7 pm to 3-8 pm during the summer period. Further details on this proposal are available in our response to Question 10.

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.

Voltus supports the current CPEC procurement structure and recommends that the Department of Energy Resources (DOER) invest in a public information disclosure platform for Energy Suppliers. This platform would allow suppliers to transparently

display their remaining procurement obligations for a compliance year, the anticipated release date of the next procurement Request for Proposals (RFP), and the price range of the most recent RFP. Drawing inspiration from existing models such as the application portals for the SMART program, where utilities provide weekly updates on capacity block credits and pricing details (as seen with [Eversource](#)), this platform would significantly mitigate pricing and availability uncertainties for potential CPS participants. By providing clear and up-to-date information, stakeholders can make more informed investment decisions in the energy market.

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?

Voltus is an active participant in the Connected Solutions program, and we've observed that certain Connected Solutions events (occurring between 5-8 pm) extend beyond the CPS peak period window in the summer (3-7 pm). In light of this, Voltus suggests that the CPS program reassess the peak period during the summer and extend it to 3-8 pm. Through a comprehensive cost-benefit analysis, utility demand response programs have already determined that dispatching between 3-8 pm yields the greatest benefits for grid reliability. Thus, we advocate for aligning CPS program hours with these critical periods to ensure cleaner and more efficient energy usage during peak hours. Moreover, this adjustment better acknowledges the contribution of renewable resources, promoting increased production and reduced consumption during peak system hours.

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.

Voltus does not have comments to this question.

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.

Voltus does not have comments to this question.

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

Voltus does not have comments to this question.

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.

Voltus does not have comments to this question.