



May 3, 2024

Ms. Samantha Meserve  
Massachusetts Department of Energy Resources  
100 Cambridge Street  
Boston, MA 02114

RE: CPS Review Comments

Dear Ms. Meserve,

The University of Massachusetts Dartmouth (“UMASSD”) is pleased to provide the following comments in response to the Massachusetts Department of Energy’s 2024 Clean Peak Energy Standard Review.

The Clean Peak Energy Standard (“CPS”) provides important financial incentives for large end users like UMASSD to adopt behind-the-meter energy storage technology that can be operated to shift an end user’s grid demand and support Massachusetts’ grid modernization and decarbonization efforts. The CPS has had a direct impact on UMASSD’s decision making to invest in new onsite battery storage projects, and the University strongly recommends against modifying existing program rules in any way that would dilute the existing incentives provided under the program.

In 2019, UMASSD installed a 500-kW lithium-ion battery storage system leveraging advanced energy efficiency pilot funding provided by Eversource Energy. The battery system is currently owned and operated by FirstLight Energy and has been registered as a Clean Peak Resource.

Over the last year, UMASSD has evaluated installing a second larger behind-the-meter battery storage system on campus. After conducting a competitive request for proposals, UMASSD has chosen to pursue a new 5.0 MW non-exporting battery project. The financial incentives offered by the CPS played a major role in the University’s decision.

Looking forward, UMASSD sees three areas for potential improvement to support additional battery projects like the one we are currently pursuing: 1) ensure Clean Peak Resource applications are reviewed expeditiously by DOER, 2) ensure that end users like UMASSD can fully leverage and maximize CPS incentives along with Connected Solutions incentives, and 3) work with the electric utilities to improve the timeliness and complexity of the interconnection study process for non-exporting behind-the-meter battery storage systems.

Please do not hesitate to contact me at [cdoyle4@umassd.edu](mailto:cdoyle4@umassd.edu) with any questions on these comments. UMASSD appreciates DOER taking the time to solicit stakeholder feedback on the CPS to ensure the program continues to effectively serve the Commonwealth moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christine Doyle'.

Christine Doyle  
Interim Chief Financial Officer