



May 27, 2025

2024 Climate Act Stakeholder Sessions – Siting and Permitting

Executive Office of Energy and Environmental Affairs
Office of Environmental Justice and Equity
Energy Facilities Siting Board
Department of Public Utilities
Department of Energy Resources

Dear Commissioner Rubin, Undersecretary Judge, and Undersecretary Belen Power,

Flatiron Energy is an independent power producer focused on the development of utility-scale, standalone storage in the Northeast. The leadership team at Flatiron Energy has over 60 years of collective experience working in standalone storage and over 100 years of combined experience working in the power and finance industries. The Flatiron leadership team has extensive experience developing storage in New England, in addition to a history of building over 20 operational and profitable energy storage projects. Flatiron Energy is a partially woman owned, certified B Corporation, with a commitment to ethical, community-first development.

Flatiron Energy commends the Executive Office of Energy and Environmental Affairs (“EEA”), Office of Environmental Justice and Equity (“OEJE”), Energy Facilities Siting Board (“EFSB”), Department of Public Utilities (“DPU”), and Department of Energy Resources (“DOER”) for their commitment to developing, siting and building reliable and clean energy projects in Massachusetts. The Commonwealth has been a consistent leader in the clean energy industry and proven their dedication to continually improving the development landscape for all stakeholders. The 2024 Climate Act was a key step forward in this endeavor, and the EFSB straw proposals are a necessary and meaningful step towards implementing these goals.

The move to a single, consolidated permit issued for projects from the EFSB will help the Commonwealth meet its climate mandates in an informed and timely manner. This process will enable Massachusetts to ensure that staff involved in permitting have the time and expertise to dedicate to the permitting process. Further, by consolidating the stakeholder and expertise to a single permit, the Commonwealth will be able to run a more efficient process, creating time and consumer savings. Given the urgency of meeting Massachusetts’ climate goals, the reforms suggested by the EFSB will be a necessary part of the state’s clean energy future.

Siting energy storage under the EFSB is a recognition of the intersectional nature of large-scale clean energy projects. Projects rarely create a single impact on a community but rather bring a host of new benefits and considerations up for discussion. Bringing these discussions together under a single umbrella will allow for a more meaningful and in-depth understanding of a project’s impact on the local community. As part of this consideration, Flatiron would suggest that the EFSB consider the positive impacts of a project as well – be it increased local employment, reduced carbon dioxide emissions, reduced adverse health impacts from fossil fuel plants, lowered energy bills, or local benefits from a

Community Benefit Plans – as part of the analysis. By doing so, the EFSB can ensure that projects are examined for their full impact on the fabric of the Commonwealth.

Finally, Flatiron strongly supports the state’s commitment to creating a more expeditious permitting pathway. As noted in Stakeholder Session 3, historically the EFSB has taken 1-4 years to issue permits, after which projects must receive all state and local permits. The move to a 15-month process is an improvement in the timeline that will help projects move faster and meaningfully reduce development costs. Flatiron urges the State to consider ways to keep the total permitting timeline to 15 months or less to help make the process easy to engage with, both for developers and for community members. Doing so will allow stakeholders to stay engaged throughout the process and lead to a meaningful and productive permitting process.

Flatiron Energy thanks EEA, OEJE, EFSB, DPU and DOER for the opportunity to comment on the 2024 Climate Act Stakeholder Sessions and looks forward to continuing to engage with the agencies on improving siting and permitting of clean energy projects in the state.

Sincerely,

/s/ Rebecca Behrens

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