



July 15, 2025

Thomas Ferguson
MA Department of Energy Resources
100 Cambridge St., 9th Floor
Boston, MA 02114

Re: Energy Storage Grant Program Straw Proposal

Dear Mr. Ferguson:

The Massachusetts Municipal Wholesale Electric Company (MMWEC), the Commonwealth's designated joint action agency for municipal utilities, welcomes the opportunity to comment on DOER's Energy Storage Grant Program Straw Proposal.

MMWEC is excited by DOER's Energy Storage Grant Program Straw Proposal and is appreciative of providing feedback.

MMWEC and municipal light plants (MLPs) have been at the forefront of energy storage deployment and community resiliency, having deployed the state's first grid scale energy storage and resiliency project in 2016. This initial project provided peak load reduction to the Sterling Municipal Light Department as well as backup power to the Sterling Public Safety complex and 911 dispatch center. More recently, MMWEC has entered a partnership with Lightshift Energy and is currently in the process of installing over 50 MW of battery energy storage systems in MLP service territories. As part of this partnership, MMWEC and the state's MLPs have again worked to leverage the capability of energy storage systems. Recently installed projects in Groton and Wakefield are not only providing peak load reduction, but are providing backup power to an elementary school, a high school, and a regional vocational school.

We are excited to continue our work of helping the Commonwealth meet its 2050 goals by utilizing energy storage systems. As such, we offer comments on the community resilience category of the grant proposal. The Commonwealth uses Census designated blocks for mapping environmental justice (EJ) communities, which can cause misalignment of EJ communities within a certain city or town and infrastructure that would benefit from resilient backup and energy storage. Using the town of Ludlow (where MMWEC is based) as an example, there are multiple EJ designated blocks within the community. However, infrastructure that would benefit from the resiliency energy storage systems provide, such as the local middle school, high school and local boys and girls club, are not located in these EJ blocks, and therefore may be ineligible for grant funding under this category.

Therefore, we would request that DOER in their final proposal continue to direct funding for community resilience projects to an EJ community or **directly benefiting** an EJ community. This would allow projects, like the one proposed above, to benefit the town of Ludlow and EJ communities by being able to receive grant funds, even if the physical infrastructure is not located directly in an EJ designated block.

MMWEC supports the state's decarbonization and resiliency goals and believes these transformative energy storage projects will significantly contribute.

Sincerely,

Kathryn M. Roy, Dir. Communications & External Affairs