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July 15, 2025

By email: Thomas.Ferguson@mass.gov

Thomas Ferguson
Massachusetts Department of Energy Resources
100 Cambridge Street
9th Floor
Boston, MA 02114
Subject: Advancing Massachusetts Power: Energy Storage Grant Program Straw Proposal

Mr. Ferguson,

RENEW Northeast, Inc. ("RENEW")¹ submits these comments in response to the Department of Energy Resources' request for written comment on the Advancing Massachusetts Power ("AMP"): Energy Storage Grant Program Straw Proposal. Successful implementation of the AMP grant program may influence the development of new long duration energy storage ("LDES") facilities. Maximizing LDES development allows the Commonwealth to realize the benefits of energy storage, including providing clean, affordable, and reliable energy to meet the Commonwealth's clean energy goals. RENEW offers these comments on the LDES Commercialization Subprogram.

RENEW is concerned that the Straw Proposal round-trip efficiency ("RTE") minimum requirements for the LDES Commercialization subprogram could negatively impact LDES from participating in the grant program and project viability. While there may be reasonable metrics to evaluate a project, including concern pertaining to emissions, assessing a project solely on the 50% minimum eligibility requirement establishes an artificial barrier that poses to eliminate promising LDES technology and stifle project innovation. At a time when Massachusetts is seeking to promote LDES technology, inclusion of this metric creates a barrier stymieing LDES technologies from providing critical reliability needs and impeding Massachusetts' clean energy goals. For this reason, RENEW recommends that this RTE minimum be taken as a non-binding consideration as part of the LDES application evaluation criteria.

RENEW appreciates the opportunity to provide comments on how best to implement and support LDES technology in the Commonwealth.

Sincerely,
Nathan Raike
Nathan Raike
State & Local Affairs Manager

¹ The comments expressed herein represent the views of RENEW and not necessarily those of any particular member of RENEW.