

Responses below are from Abigail Despres, Program Director with [Clean Energy Solutions, Inc.](#), a Boston-based consulting firm that has been working with EJ and LMI communities across the commonwealth to develop various clean energy + storage projects for a little under a decade.

General / All Subprograms

1. Are there any program areas currently not included that you feel should be included? If so, what are those areas, and why should they be included?

- See comments below.

2. Are the rough maximum grant levels by subprogram and the estimated number of projects sufficient to motivate you to apply? If not, what would be? Community Resilience Safety & Education LDES Commercialization \$2.5 million \$400-800 thousand \$5 million

- Yes, these levels are sufficient to motivate an application- especially given the federal funding landscape and scarcity of grant opportunities at this time.

3. Based on the project milestones in the straw proposal, does the proposed timing of financial disbursements align with your project's needs? If not, how would you recommend the timeline be adjusted? In your response, please indicate the subprogram to which your comments refer.

- **Community Resilience Sub-Program:** Given the lead times on both interconnection service agreements and the process of ordering batteries, we will often try to move forward with our ISA application and the purchase of a system at the same time. The majority of the funding, I would say 60% or so, would likely be needed before an ISA is approved. I think that the milestones you include are generally appropriate but I would include a milestone for the purchase order or some sort of proof of purchase and include a 15% disbursement with that milestone, and then change the Major Equipment Delivery to 15%.
 - In our experience, the majority of our non-profit clients operate under some sort of debt freeze, so they aren't able to finance projects like this upfront and then be reimbursed.
 - Other milestones you could consider is if a project received BABA approval for a waiver.
- **LDES:** Same recommendations- funding needs to be more heavily weighted up front.

4. Please provide comments on the following elements common to all subprograms. In your comments, please indicate the subprogram to which your comments refer:

a. Project eligibility

b. Project evaluation criteria

c. Project requirements

- "Preference towards Massachusetts-based companies" → Are non Massachusetts companies/facilities allowed to apply?
- Where do you draw the line between Community Resilience vs LDES Commercialization? Can they overlap or can funding only come from one subprogram at a time?
- The focus on EJ/LMI should be further emphasized

5. For Community Resilience and LDES Commercialization projects, what is reasonable to expect around interconnection status at the time of application? What are the typical determinants of longer interconnection processes? (please indicate the subprogram to which your comments refer)

- We're seeing lead-times of 3-5 years for interconnection agreements. DOER may want to consider some sort of advocacy pipeline to assist with securing these agreements, or allow for flexibility/waivers if an ISA isn't able to be secured in time.
- I think it would be unreasonable to expect an interconnection service agreement to have been secured at the time of an application. The vast majority of these projects are likely struggling with financing to the point that they haven't been able to move forward or consider an ISA yet until funding is secured.
- The larger the project, the longer the process for an ISA. Generally though I think it comes down to the project management of the application team/how much they're able to continue to push the utility forward on the application.

6. For Community Resilience and LDES Commercialization projects specifically in EJ/LMI communities (please indicate the subprogram to which your comments refer): a. What existing funding sources have you pursued or secured for clean energy or resilience projects? What barriers have you encountered in pursuing or securing those funds? b. What cost-sharing arrangements would be reasonable or feasible for your community or organization? Are there innovative or non-financial approaches to cost-sharing that you would recommend?

- We have almost exclusively relied on MassCEC/EmPower funding to date. All of our successful federal funding applications have been rolled back.
- I think there are different levels of cost sharing that could be reasonable, based on the client. For a local non-profit I think that any cost sharing would likely be prohibitive. For a municipality or housing developer I think a 25% cost share would be reasonable.
- Many consulting firms/developers would be willing to offer in-kind services as a match to the cost share requirements.

7. For Authorities Having Jurisdiction (permitting and safety review boards, fire departments): what is the minimum level of technical and project detail required to conduct an initial review of an energy storage project application? What are the key data points or documents that must be included in a complete submission? a. At what point should a revised project scope trigger a new review or resubmission? What types or magnitudes of changes (e.g. technology, size, location, use case) should be considered significant enough to warrant reevaluation?

8. Please provide any additional feedback that is not covered by these questions or any of the questions under the subprogram categories below. Community Resilience We invite your input to help ensure this program effectively serves communities across the Commonwealth, particularly EJ and LMI populations. Your perspective will guide program design, funding priorities, and technical assistance efforts.

Project Benefits

9. What specific benefits (resilience and non-resiliency) do you expect an energy storage project to deliver to your community, and who would be the beneficiaries?

- The most consistent benefit would be resilient heating and cooling, In the event of an outage the most important benefits would be access to communication- wifi/cell service. Another critical benefit is resilient cooking facilities.
- Depending on the location of the resilience I would also say that mobility is a critical service- resilient elevators, security lights, automatic doors, etc.

10. What site/site loads would you be most interested in making more resilient by installing an energy storage system? What duration of operation (e.g. during a grid outage) would be most valuable?

- Heating/cooling systems, elevators, and lighting.

11. How do you balance resilience needs with revenue opportunities (e.g. market participation vs. emergency reserve requirements)? a. Is it reasonable to expect these projects to maintain a high state of charge (e.g., 90%) before severe weather events to ensure resilience? How might this affect your project's revenue potential?

- Without solar or some other form of renewable energy I don't think that it would be reasonable to expect the batteries to maintain such a high level of charge. 75% may be reasonable. If the battery storage is paired with solar or another form of renewable energy then the state of charge could remain higher.

Community Ownership and Project Feasibility

12. What barriers do EJ or LMI communities face in owning and operating energy storage projects? What technical, financial, or operational support is needed to overcome those barriers? What ownership and business models help communities realize the benefits of energy storage systems? a. What types of support (e.g. technical assistance, training, partnerships) would increase your community's capacity to own and manage these systems? Safety & Education We are seeking input to help design a program that supports the safe and effective deployment of energy storage systems. Your expertise is critical in ensuring local authorities and first responders are well-equipped to evaluate proposed projects and ensure that codes, standards, and best practices are followed so that systems operate safely.

- We've done some thought work and writing on these topics, and can have a conversation/share materials at your convenience.

13. From your organization's point of view, what are the most significant challenges to the following, and what types of programs or support (e.g., technical assistance, funding, coordination) would be most useful to your organization in addressing the following:

- a. Energy storage permitting and safety**
- b. Energy storage education**

14. Are there currently available energy storage safety programs that your organization would consider taking advantage of if funding was available to do so? Please list those programs and describe their benefits.

15. Are there energy storage safety and education objectives beyond those listed in the straw proposal presentation that DOER should consider pursuing through this subprogram?

16. How could projects funded through this program have broad impacts across the Commonwealth? LDES Commercialization We aim to better understand the potential and limitations of proposed LDES projects under this funding opportunity. Your insights will help calibrate expectations and improve program effectiveness.

17. Based on your experience, what scale or type of LDES project (e.g. system size, duration, customer class) can realistically be developed with \$5M in grant funding, assuming it covers up to 50% of costs? Please consider both capital and soft costs in your response.

- If the grant can be leveraged to cover what we call the “resilience gap” (the \$ amount that will not be recovered through savings and incentives through the project’s lifespan) to cover the downpayment on a loan, or leveraged against some form of debt, then I would expect \$5M to cover 10+hours of resilience for 2-5 buildings- it’s so subjective though that it’s very difficult to say what this could cover. One key question is what loads need to be included in the 10 hours of resilience to qualify?

18. Do you currently have LDES (10+ hr.) projects in Massachusetts in your development pipeline? Please only share non-confidential information and remember that DOER makes all comments received publicly available.

a. What is the scale and timeframe of those projects to achieve deployment?

b. Please describe the purpose of the project. If it is a demonstration project, please describe the objectives and goals for the project and how it will further technology commercialization. If it is a commercial project, please describe the use case and sources of revenue.

- We have several of these types of projects in the pipeline and would be happy to share details through a conversation.