



SUBMITTED ELECTRONICALLY

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Feedback on Advancing Massachusetts Power Straw Proposal

The Massachusetts Clean Peak Coalition's (MACPC) mission is to facilitate the transition to clean peak energy by partnering with impacted communities and community-based organizations through technical assistance, capacity building and information sharing, focusing on replacement of peaker power plants with 100% clean and renewable energy technologies. Our member organizations are Berkshire Environmental Action Team (BEAT), Mass Climate Action Network (MCAN), Slingshot, and Clean Energy Group (CEG).

We'd like to thank DOER for initiating this grant program. Fostering adoption of energy storage is a key element to meeting the Commonwealth's mandate to achieve net zero emissions in the energy sector, and addressing climate change. Please see our comments on the Advancing Massachusetts Power (AMP) straw proposal below.

OVERALL FEEDBACK

The ISO New England interconnection process takes a VERY long time. We watched a developer looking to transition a fossil fuel peaker plant to ESS go through multiple interconnection re-study requests from ISO New England with long wait periods in between requests. The entire process took 2-½ years, even though the project is re-using the existing transformers and interconnections. We recommend altering the payment milestone to be for submitting interconnection documentation showing the process has started instead of a fully executed document, which could take more than a year.

Grant levels for the Community Resilience and Safety/Education programs seem to be generally adequate (hopefully with exceptions made for extraordinary proposals that may require slightly more), and have already sparked interest among colleagues in our community. The grant level cap of \$5M for LDES Commercialization is low, especially for larger scale projects (see comments two paragraphs below).

In speaking with community groups, we're hearing concern that once again, the real grassroots EJ community organizations are in danger of not receiving adequate time or support to be able to participate in these opportunities. Community organizations mostly work on building a broad based consensus among all affected community members, most of whom have no background in energy issues and technology. The necessary public education and deliberation over the best possible project path takes time. Please consider extending deadlines if at all possible.

• **LDES COMMERCIALIZATION**

We would like to see direct replacement of peaker power plants included in the LDES Commercial Target Audiences defined on slide 39, and the \$5M cap raised as much as possible for those.

The LDES Commercialization grant capping at \$5M is low to make a meaningful difference in some of the most impactful possible scenarios. We've studied several fossil fuel peaker plants and have been in conversations about decarbonization / transition to ESS with two owners. One fossil fuel peaker owner is moving ahead with a Phase I transition to a relatively small (45MW), most likely to be lithium based ESS, but is very inclined to adopt non-lithium LDES for development of Phase II (approx. 100MW). Another owner currently operating a fossil fuel peaker power plant has voiced interest in converting to ESS, but so far they've had trouble finding a path to make it financially feasible.

Both of these peaker plants are located in the center of western Massachusetts cities with substantial EJ neighborhoods nearby. In Pittsfield, these neighborhoods in the formerly industrial heart of the city where the plant is located have a life expectancy 12.5 years shorter than the outlying neighborhoods. We have also heard from business leaders in the city that the presence of an aging fossil fuel peaker is driving away clean tech developers who were otherwise interested in establishing themselves in western Massachusetts. The climate, economic and public health benefits of eliminating this large source of pollution could be lifechanging for surrounding neighborhoods.

Transition away from fossil fuels for projects of this size would stand as excellent examples of the benefits of ESS to developers and to communities that may otherwise have reservations.

• **COMMUNITY RESILIENCE**

Slide 16 references DOER's intention to target at least 40% of all grant funding to EJ communities or projects serving EJ populations. Rather than a target of 40% of grant funding going to EJ communities or EJ serving projects, MA DOER should consider setting aside a carve out of 40% of grant funds to go towards these projects. The most impactful projects serving EJ communities, such as those benefiting community facilities or targeting peaker plant replacement, often require more upfront work, such as community outreach and multi-stakeholder coordination, to put together a grant application. Without a carveout, it is highly likely that the majority of funds will go towards developer-led projects, which are more likely to be commercially viable even without state grant funding support. In addition, MA DOER should consider incorporating additional incentives, such as a lower required match amount, for projects based in EJ communities. These additional incentives can help overcome the higher barriers to participation that EJ projects often face.

Thank you for including Option 1: Pre-Construction Support.

This will be crucial for reaching and preparing EJ / LMI communities who can most benefit from

clean energy and storage projects.

We would recommend 100% of feasibility cost for affordable housing and other community-based programs instead of 75%. Community based organizations most often work on minimal budgets and would likely have more trouble finding donors or additional grants for the preparatory phase of a not-yet-finalized project.

A more comprehensive list of qualifying project applications from DOER would be helpful in getting more organizations to apply. i.e. Would islanding for public housing units count, or would it need to be for common areas only?

The Eligibility guidelines specify 50+kW systems, but don't mention kWh minimum requirements or limits. Knowing how many kWh a system would need to serve would be a key consideration for system cost and space requirements.

Finding reputable analysts or project vendors

A concern that arises frequently when we talk with both individuals and community organizations is uncertainty over which consultants or contractors are reputable.

Guidance in finding a reputable company should be part of the feasibility report process. There are currently many companies taking advantage of the current decarbonization push, proposing projects in our region. Some may be less reputable than others. Community organizations most often don't have sufficient funding to survive a financial hit if projects go wrong without allowances for contractor or analyst errors.

Does DOER or any other Commonwealth agency have a list of vetted consultants for feasibility studies, or contractor certification for implementation of projects?

Will there be technical support in finding a range of commercially available tech?

As with concern over which vendors are reputable, there are many commercially available tech brands and varieties of ESS technologies, and no obvious way to check how they rate for safety and reliability. A vetted list by DOER or another Commonwealth agency could go a long way to helping community organizations sort through what's available.

• SAFETY & EDUCATION

Hopefully consideration for general public education on ESS technologies, not just safety procedures, will be allowed. In speaking with community groups, we're finding that basic education on different types of ESS systems helps allay fears and counters misinformation, leading to significantly higher levels of acceptance of storage project proposals.

Often the groundwork for these projects is through the work of *networks of community organizations*. The range of project types outlined as the subprograms in this straw proposal also sets up chances for synergistic collaborations between organizations in each subprogram. i.e. Groups working together toward one goal may include a community group applying for the community resilience subprogram, another group applying for safety and education

subprogram, and a developer applying for the LDES commercialization subprogram. Applications that work in conjunction with other applicants should receive strong consideration.

Many community-benefiting projects in particular would not be at the point of being ready to apply for funding without significant legwork by these groups to bring developers to the table. Even simple scheduling between grassroots organizations takes time. It's worth allowing for extra time, rather than jeopardizing the opportunities for communities who would stand to benefit the most from projects like these.

Application Review Criteria on Slide 34

MA DOER should add additional criteria related towards advancing knowledge on the benefits of energy storage, including long duration energy storage technologies. While combating misinformation regarding the safety of battery storage is important, it is also valuable to highlight how battery storage can provide additional benefits to communities, particularly in contrast to fossil fuel technologies. This engagement and education can also help create a potential pipeline of projects for the other portions of the grant program such as community resilience.

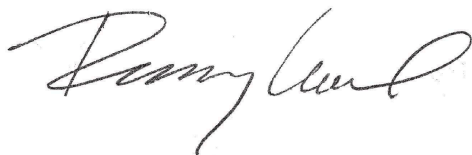
In the Community Organization sample on Slide 36, the "when" sample says "single use". Please define what "single use" means. Like with advertising, public education on a subject not commonly addressed by the general public will require repeated exposures to the information. We highly recommend allowing repeat messaging in the budget.

SUPPORT FOR THE "AMP" GRANT PROPOSAL

The Mass Clean Peak Coalition (MACPC) strongly supports the goals of this proposed grant program. We have been advocating for adoption of storage and transition of fossil fuel peaker plants to storage for several years, and can see the value of this program in moving the needle on project development. It's strong emphasis on supporting community-benefitting projects, education on ESS technologies, and deployment of non-lithium-based systems echo our interests as well. Please keep us abreast of revised drafts and future comment periods as the program is further developed.

Thank you for your consideration of these comments. If you have any questions, please contact Rosemary Wessel, BEAT Peakers in the Past Initiative Director, Berkshire Environmental Action Team, at rose@thebeatnews.org.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Rosemary Wessel", with a stylized, flowing script.

Rosemary Wessel, *Berkshire Environmental Action Team*
On behalf of Mass Clean Peak Coalition member organizations