



July 18, 2025

Via electronic filing: Thomas.Ferguson@mass.gov

**RE: AMP Stakeholder Feedback**

Mr. Thomas Ferguson  
Energy Storage Programs Manager  
Massachusetts Department of Energy Resources  
100 Cambridge Street, 9th Floor  
Boston, MA, 02114

Dear Mr. Ferguson

Nexamp appreciates the opportunity to provide feedback to the Advancing Massachusetts Energy (AMP) energy storage grant program Straw Proposal (Straw Proposal) that was presented via webinar on July 1, 2025.

As the largest developer, owner, and operator of community solar assets in the U.S., Nexamp has been at the forefront of efforts to make clean energy affordable and accessible for all Americans. Many of our community solar projects include energy storage. We are also developing a significant standalone energy storage pipeline across various jurisdictions. By managing all aspects of a project's lifecycle in-house—from development, engineering, and construction through operations and customer management—Nexamp brings rapid renewable energy deployment and high-quality jobs to the communities we serve. In 2015, Nexamp launched the first open-to-all community solar program that eliminates credit checks, up-front fees, and long-term commitments to help customers save up to 20% on annual electricity costs.

Understanding the goals of the AMP Straw Proposal to focus on community resiliency, safety and education, and long duration energy storage, Nexamp offers comments for consideration in response to the guiding stakeholder question 1: *Are there any program areas currently not included? If so, what are those areas and why should they be included?* Along with some additional comments on the Community Resiliency category of the Straw Proposal.

**Comments on Question 1: *Are there any program areas currently not included? If so, what are those areas and why should they be included?***

Nexamp believes that the AMP Straw Proposal is missing an opportunity to support targeted DG solutions in municipal utility territories. While we understand that the challenges facing the DG market in Massachusetts cannot be fully addressed by this \$50M grant program, we believe the concept of a bulk/peaker replacement program—focused on front-of-the-meter storage for municipal utilities—could effectively support some targeted DG-level projects and address immediate and urgent grid needs.

An upfront incentive through this grant that prompts MLPs to issue RFPs would be a well-aligned and impactful use of the funding. Storage deployed in municipal utility territory provides customers with enhanced grid reliability, cost savings, and support for clean energy goals. By

reducing the MLP's coincident peak demand and providing fast-response services, FTM storage helps stabilize the grid and reduce the likelihood of outages. ISO-NE currently lacks supply to meet demand in the 25 GW range. The longest scarcity event since 2016 occurred on 6/24/2025, lasting more than 3-hours as the load peaked just above 26 GW, the 10th highest all-time load in ISO-NE. New England urgently needs more storage to support the grid during peak hours.

**Comments on Community Resilience Grant Category:**

Nexamp also recommends additional clarity in the forthcoming program guidance on how DOER intends to prioritize and select projects under the Community Resilience subprogram. While the Straw Proposal outlines general evaluation criteria such as resilience capability, community engagement, and project viability, it remains unclear how these factors will be weighted or interpreted during the selection process. Understanding these considerations is critical for applicants to tailor their project designs and partnerships in ways that align with program goals.

Nexamp recommends that DOER consider assigning greater value to BTM energy storage projects that are paired with connected renewable generation. These hybrid systems not only enhance the resilience of the host site by enabling longer-duration islanding during grid outages but also contribute to a cleaner environment and improved local energy security. Nexamp also encourages DOER to consider facilities that do not have the physical space or structural capacity to host energy storage or renewable generation systems on-site but still demonstrate strong interest in advancing community resilience through these technologies.

**Comments on grant caps:**

Nexamp recommends clear guidance on how project costs are calculated to determine the grant caps of 50% of project costs (or not more than \$2.5M). Specifically, for projects that include renewable generation paired with energy storage, it is important to understand whether the 50 percent cost-share will apply to the entire integrated project or only to the energy storage system component only. Given that renewable generation can be integral to maintaining battery charge levels for resilience applications, a holistic view of project costs may be warranted. Transparency in this area will allow applicants to structure their financing strategies accordingly and ensure that projects are scoped and budgeted in alignment with program expectations.

Nexamp applauds DOER for its thoughtful design of the Straw Proposal to support energy storage, which reflects a deep understanding of the challenges, opportunities, and benefits that energy storage provides. We urge DOER to move swiftly toward launching the program.

Thank you for the opportunity to provide comments. Please do not hesitate to reach out if there are any questions.

Thank you,

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