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Massachusetts Department of Energy Resources
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Sent via electronic mail to thomas.ferguson@mass.gov

Re: AMP Stakeholder Feedback

To the MA DOER AMP Team,

Ecogy Energy (Ecogy) hereby responds to the stakeholder questions provided as it relates to the Advancing Massachusetts Power (AMP) energy storage grant program under the Massachusetts's Department of Energy Resources (DOER).

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?

No comments on this item.

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

At this time, Ecogy feels the proposed grant amounts are sufficient barring any changes made to the options or structure of the grant program.

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 Option 1: The feasibility study grant should be paid at the time of invoice, not at the time of the completion of the study. Regardless of when this is paid, there will not be alternate results at the output of the study. Ecogy recommends that 50% of the feasibility study costs to be covered be paid upfront, and the remaining 25% to be paid at the time that the developer provides the results to AMP.

Community Resilience Option 2 & LDES Commercialization: The milestones do not make align with the project needs, in particular the payment of the major Equipment Deliverables and Mechanical Completion Milestones. Depending on the size and scale of the project, deposits will vary from anywhere to 10% to 50% of the total equipment cost. To allow for a more seamless construction and development timeline, projects should receive a larger upfront milestone payment at the Interconnection Milestone. Ecogy recommends the following to allow for adequate project development for these categories:

- **Acceptance into AMP-ESGP: 5%**
- **Interconnection Agreement Milestone: 35%**
- **Major Delivery Equipment: 20%**
- **Mechanical Completion: 20%**
- **Substantial Completion: 10%**
- **Final Completion: 10%**

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

No comments at this time, as Ecogy feels these all items regarding eligibility, evaluation criteria, and requirements are appropriate.

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

Ecogy has not had an Energy Storage project that has made it through the Interconnection Queue at this time.

6. For Community Resilience and LDES Commercialization projects specifically in EJ/LMI communities (please indicate the subprogram to which your comments refer):

No comments for this section.

- 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?
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?

Ecogy is not an AHJ so does not have a comment on these items.

- 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 re-evaluation?

8. Please provide any additional feedback that is not covered by these questions or any of the questions under the subprogram categories below.

Ecogy feels that the Safety & Education allocation be reallocated to the Community Resilience and the LDES Commercialization programs accordingly, based on the number of projects that are awarded. Each project should receive an allocation of funding for such Safety & Education training, as this is a huge concern to AHJs, and will greatly alleviate concerns as this will be a Commonwealth-funded program with a set curriculum designed to MA Standards.

Additionally, as part of the Safety & Education allocation being reallocated to Community Resilience and LDES Commercialization, a set allocation should be designated for permitting support in varying forms (compensation, resources and materials, AMP representation and support with AHJ meetings). Having this level of support from the Commonwealth will greatly increase the likelihood of a more streamlined and efficient AHJ permitting process.

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?

No comments on this item.

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?

No comments on this item.

11. How do you balance resilience needs with revenue opportunities (e.g. market participation vs. emergency reserve requirements)?

No comments on this item and the subsequent items under this question.

- 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?

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?

EJ or LMI communities face the primary barrier of financing and education around energy storage projects. Additionally, if EJ or LMI communities do not have owned buildings present but are all leased/rent-paying tenants then there are issues with putting energy storage systems in place. Another factor to consider is the capacity both at the mechanical and electrical levels, as well as the physical space level, of whether or not there is space near a building, or structural standing of the building should it need to be installed on it.

- a. What types of support (e.g. technical assistance, training, partnerships) would increase your community's capacity to own and manage these systems?

No comment on this item.

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.

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

The biggest issue with energy storage permitting goes hand in hand with energy storage safety and sub-bullet b. Energy storage education. Many AHJ's are not actively following standards surround energy storage systems, and moreso think about all the negative environmental impacts such systems could have, including noise, aesthetics, impact to local environment, specifically watersheds, if there are batteries involved.

- b. Energy storage education

No comments on this item.

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.

No comments at this time.

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?

No comments at this time.

16. How could projects funded through this program have broad impacts across the Commonwealth?
The projects funded through this program could have broad impacts across the Commonwealth by allowing for deployment of the necessary training and education within the areas for where the systems are actually being installed.

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.

No comments on this item.

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.

No comments on these items.

- 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.

Ecogy appreciates the opportunity to share this feedback with the MA DOER and AMP Team in regards to the Energy Storage Grant Program and looks forward to the program's rollout later this year.

Sincerely,



Michael Shelter
Director of Operations
Ecogy Energy