

Public Comment on the Massachusetts Department of Energy Resources' Charging Forward: Energy Storage in a Net Zero Commonwealth Report

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Public Comments:

Leap would like to thank the Massachusetts Department of Energy Resources (MA DOER) and Massachusetts Clean Energy Center (MassCEC) for the opportunity to provide feedback on the Charging Forward: Energy Storage in a Net Zero Commonwealth report (Report).

As a premier aggregator of DERs, including battery storage, Leap appreciates the MA DOER and MassCEC's recognition that battery storage needs further incentives to deliver on the clean energy transformation and the recommendations outlined in the Report. After thorough review of the Report, there are several items that Leap would like to provide public comment and suggestions on.

Leap would like to suggest that any transmission or distribution connected battery receiving funding from the proposed Standalone Bulk Storage program also receive a Clean Peak Energy Certificate (CPEC) multiplier < 1 if dual-participating in the Massachusetts Clean Peak Energy Standard (CPS). This multiplier would be akin to other multipliers in the CPS program (e.g. SMART multiplier, Contracted Resource multiplier) and avoid over-incentivizing projects and ensure fair funding, particularly since BTM batteries are excluded from the Standalone Bulk Storage program.

Leap would also urge the MA DOER and MassCEC to consider structuring the Resiliency funding program to be either wholly performance based or utilize a combination of upfront and performance based incentives. The requirements to receive Resiliency funding should be streamlined and could be better served by using a performance incentive where sites earn their Resiliency incentive on an annual basis by demonstrating their capabilities to provide resiliency. Further, performance based programs encourage ongoing usage of batteries for grid services. As the need for flexibility evolves over time due to changing grid mixes, as outlined by the Report, the

best mechanism to influence batteries to provide this evolving flexibility is through ongoing performance based incentives. Leap would be happy to be a stakeholder in developing this further.

Lastly, Leap would like to urge the MA DOER and MassCEC to add a fourth funding program that explicitly values exports from BTM batteries. The ConnectedSolutions program in Massachusetts recently imposed significant restrictions on how exports can be compensated, with guidance that compensation for exports is better addressed in this proceeding. This constraint represents a considerable detriment to BTM battery deployment, which as the Report outlined, is still critical - especially for resiliency. Appropriately valuing BTM battery exports is critical to the Report's and the Commonwealth's goals for grid reliability and decarbonization. BTM battery exports can provide similar if not stronger benefits than distribution connected battery storage and should be valued for these benefits in addition to the benefits precipitated by their ability to curtail end-use demand. Leap would be happy to be a stakeholder in developing a BTM battery export funding program.