



January 31, 2024

Tom Ferguson  
Energy Storage Programs Manager  
Department of Energy Resources  
100 Cambridge Street, 1020  
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RE: Comments re: Charging Forward: Energy Storage in a Net Zero Commonwealth Report

Founded right here in New England twenty years ago, ReVision Energy (ReVision) is a local, employee owned, certified B Corporation clean energy company with over 480 employees across our seven branches in New England, with nearly 100 staff in Massachusetts at our North Andover, Westfield, and Woburn locations. Our mission is to make life better by building our just and equitable electric future, which we work to advance through the installation of residential and small-scale commercial solar, heat pumps, heat pump hot water heaters, EV chargers, and battery storage systems. In the Massachusetts market, it is relevant to call attention to Revision's recent acquisition of SunBug Solar, another mission-driven MA-based solar company, which has been providing best-in-class solar solutions to residential and commercial customers to advance the state's climate goals of achieving net zero carbon emissions by 2050.

ReVision appreciates the opportunity to provide feedback regarding the recent release of the Charging Forward: Energy Storage in a Net Zero Commonwealth Report from the Department of Energy Resources (Department) in consultation with the Massachusetts Clean Energy Center. We are in alignment with the comments to be submitted by the Northeast Clean Energy Council, of which ReVision is a member. However, there are a few specific topics ReVision sought to provide commentary on given our unique experience as a developer and installer of energy storage systems.

I. Resiliency Programs

ReVision appreciates the parties' acknowledgement of the opportunity and value that behind the meter (BTM) storage assets can bring to our energy transition, especially in regard to increased resilience. ReVision agrees with the focus on incentivizing smaller-scale BTM battery storage systems that can increase resilience and ultimately serve end customers. Currently, such systems are cost prohibitive to budget-constrained entities who are often the customers that would benefit the most, such as schools or municipalities. Incentives to drive down costs could go a considerable way to enabling market participation for the most critical use cases.

Additionally, ReVision recommends evaluating the consideration of inclusion of all loads behind certain meters for critical facilities (as opposed to defining, and electrically isolating certain, deemed 'critical loads') in program development for certain end users. For example, a hospital or fire station that acts as both an emergency shelter and an emergency response service in the event of power loss should have all loads of their facilities considered critical. Moreover, we encourage the Department to consider whether such facilities could have their entire load enrolled into demand charge management as it would maximize benefits to this specific type of customers who require reliability versus customers who may only



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seek minor system back up. This could ultimately deploy a sustainable, resilient resource that provides increased benefits to such end use customers.

Finally, we recommend paired solar PV systems should also be eligible for financing under such grants as it will be a critical component to recharging during longer blackout or brownout periods. Additionally, such an opportunity enables a sustainable way to recharge outside of integrating fossil fuel generation.

### II. Interconnection

As a solar developer, ReVision is no stranger to the complexity of state interconnection procedures and utility processes. We respectfully ask the Department and its partners to prioritize the IX study outlined in the Report given the fact that interconnection remains the biggest constraint for energy storage development of any size. Advancing and accelerating such work will ensure viable projects move forward and thus aid the state in meeting its codified energy goals.

### III. Program Funding

ReVision highly encourages the Department and its partners to seek opportunities to align additional incentive programs, such as the Massachusetts Clean Peak Energy Standard and Solar Massachusetts Renewable Target (SMART) Program to identify mechanisms to alter program parameters to meet the objectives outlined in the report. This would unlock additional revenue and thus funding streams to advance this important work without further fiscal requirements. We believe such evaluation is critical and can inform the Department as to how to best allocate the \$50 million in existing funding to develop the three outlined programs. We believe there is significant synergy with existing programs, especially regarding resiliency, and thank the Department in advance for its work aligning such programs and revenue streams.

We thank the Department in advance for consideration of our perspective, and we welcome any outreach regarding further questions or clarifications. We look forward to participating in the development and implementation of such energy storage programs, and we thank the Department for its important work to advance the energy storage market in the state.

Sincerely,

/s/ Lindsay Bourgoine

Lindsay L. Bourgoine  
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ReVision Energy