

January 31, 2024

**By email:** [Thomas.Ferguson@mass.gov](mailto:Thomas.Ferguson@mass.gov)

Tom Ferguson, Energy Storage Programs Manager  
Massachusetts Department of Energy Resources  
100 Cambridge St., 9th Floor  
Boston, MA 02114

**Subject: Comments on “Charging Forward: Energy Storage in a Net Zero Commonwealth”**

Mr. Ferguson:

Brookfield Renewable<sup>1</sup> acknowledges the significant work on behalf of the Department of Energy Resources (Department) in developing the Charging Forward: Energy Storage in a Net Zero Commonwealth Study and Report (Study and Report), and we appreciate the opportunity to provide brief comments herein.

Brookfield Renewable notes that Section 80 of Chapter 179 of the Acts of 2022 required, among other considerations, the Department in consultation with the Massachusetts Clean Energy Technology Center to study “how to optimize the cost-effective deployment and utilization of both new *and existing* mid-duration and long-duration energy storage systems” (emphasis added). Although the Study and Report comprehensively describe strategies and policy support for the deployment and utilization of new mid-duration and long-duration energy storage

---

<sup>1</sup> Brookfield Renewable’s U.S. business is a leading owner, operator and developer of renewable power, delivering innovative renewable power solutions that accelerate the world towards a sustainable, low-carbon future. In Massachusetts, our facilities include a 660MW pumped hydropower storage facility (Bear Swamp), a 10MW hydroelectric facility (Fife Brook) and a large fleet of affiliate-owned existing and proposed distributed solar generation.

systems, analysis of existing energy storage is limited only to a review of Massachusetts-located pumped hydropower currently in operation. Specifically, this review highlights concerns of environmental advocates<sup>2</sup> while largely ignoring analysis of current use-cases, including pumped hydropower's important role in both supporting the reliability of the ISO New England system and avoiding emissions, as well as future optimization potential.

Brookfield Renewable instead encourages the Department to more closely review the role of existing pumped hydro in facilitating the Commonwealth's clean energy targets in 2030 and beyond, and to consider the extent to which these unique facilities can be further optimized as additional renewable energy is deployed and economy-wide electrification expands.

Thank you again for the opportunity to provide feedback. Please feel free to contact me directly with any questions.

Sincerely,



Steve Zuretti  
Senior Director, Origination and Policy  
Brookfield Renewable  
[steven.zuretti@brookfieldrenewable.com](mailto:steven.zuretti@brookfieldrenewable.com)  
323-400-9715

---

<sup>2</sup> The Report at pg. 10.