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Commonwealth of Massachusetts  
Department of Energy Regulation  
100 Cambridge Street #1020  
Boston, MA 02114

To Whom It May Concern,

Onyx Specialty Papers, Inc (herein Onyx) located in South Lee, Massachusetts would like to provide comments on DOER's recently published report **Charging Forward: Energy Storage in a Net Zero Commonwealth Study**. Onyx's recent efforts to develop a behind-the-meter, non-exporting battery energy storage system were stymied by Eversource Energy's and ISO New England's interconnection study process, to the point that Onyx cancelled the project and is no longer pursuing an onsite storage system. Onyx observed and experienced poor communication, lack of transparency, and high study costs during the initial steps of the interconnection study process, which sent a clear message that interconnecting our battery system would be an uphill, costly battle that would take years. If DOER wants commercial and industrial (C&I) end users to actively contribute to Massachusetts' energy storage goals and to fulfill the Commonwealth's various programs aimed at supporting energy storage adoption among end users – including ConnectedSolutions and the Clean Peak Energy Standard – there needs to be fundamental changes and improvements in the interconnection process for customers.

As background, Onyx proposed a 3 MW/9 MWh lithium-ion battery system in 2022 and worked with Eversource and Onyx's chosen storage provider, Tangent Energy Solutions, to try to acquire an Interconnection Agreement. Onyx experienced the numerous interconnection challenges highlighted in the Charging Forward Study firsthand. The process started on October 13, 2022, when the Onyx Interconnection Application was considered complete for No. ESMAEX-00954. The project seemed to stall for over a month after the Interconnection Application was considered complete at which time Onyx initiated discussions to schedule bi-weekly virtual meetings with Eversource, beginning in December 2022, to advance the Interconnection Process. Those meetings were well attended by representatives from both Onyx and Eversource but generally Eversource was inconsistent with completion of Action Items agreed to in those meetings. They were also often incapable of informing Onyx of exactly where our project stood in the Application Queue or when/what was required to move our project along. Through all these discussions it was clear that our Application would be subject to a distribution system impact study and a transmission system impact study, even though the battery would be interconnected behind-the-meter and would never export energy to the local distribution system. We were told the transmission study could cost anywhere from \$7,500 to \$60,000 and the Distribution Impact Study could between \$80,000 to \$100,000. There was no clear timeline presented for either study; Eversource indicated that the transmission study could potentially take more than a year to complete.

It was clear that both Eversource and ISO New England were not considering the operating characteristics of a behind-the-meter battery system. Eversource frequently stated the need for these studies was to project how the grid would respond to a charging of the battery at times of Peak Load. Onyx stated the battery would never be charged during times of Peak Load and the battery would be charged during non-Peak periods and discharged during Peak periods. We went so far as to say that we would give



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Eversource either full control of the charging schedule or even full control of the battery itself. Eversource never commented on those offers but continued to use battery charge times as a barrier to the Interconnection Process. Along with this, in the absence of any actual study, they projected Onyx Interconnection related costs anywhere in the range of \$50,000 - \$10,000,000. Even the discussion of such costs was a deterrent for Onyx.

Eventually Onyx was required to commit \$30,000 for the Level 3 ASO and roughly \$80,000 for the Distribution Impact Study. That commitment was difficult to fund with no certainty on whether the studies themselves would lead to an approved Interconnection Agreement or, ultimately, what the final costs associated with the Interconnection Agreement would be. Based on that uncertainty, Onyx decided to abandon the project.

The above example adds credence to the Charging Forward Study's conclusion that the utility interconnection study process remains a significant obstacle to realizing Massachusetts' energy storage goals and having end users participate as an active contributor to the Commonwealth's clean energy and grid modernization objectives. Unless significant improvements are made to the interconnection study process for behind-the-meter energy storage systems, C&I customers will steer clear of energy storage development.

Sincerely,

A handwritten signature in cursive script, reading "Patricia Begrowicz".

Patricia Begrowicz

President

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