

Ferguson, Thomas (ENE)

From: Matthew Longman <mlongman@seboardsolar.com>
Sent: Wednesday, January 31, 2024 3:15 PM
To: Ferguson, Thomas (ENE)
Subject: Charging Forward: Energy Storage in a Net Zero Commonwealth - comments

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Mr. Ferguson,

In response to the DOER's request for feedback from stakeholders; We are a solar developer that's done multiple large-scale solar arrays in Massachusetts over the last 15 years. We've seen our primary concerns mentioned by other stakeholders in the comments already published, and we would simply like to add our voice to theirs.

- In the current system, energy storage capacity on a feeder is considered towards the quota of DG energy on the line, though storage is not producing additional energy the way an energy production facility like a solar array or wind farm does. It would seem that the battery's capacity should not be included in the DG quota on the lines. Otherwise, Battery Storage Projects are not eligible for interconnection where distribution lines are already full, despite not having the same impact on the grid as do energy production facilities.
- Currently, drawing power from the utility into storage units is priced at retail rates, while compensation from the utility when energy is put back into the grid is charged at wholesale rates. This would seem to make a storage facility completely financially infeasible.

Thank you for taking our concerns into consideration.

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