January 30, 2024  
Renewable and Alternative Energy Division

Massachusetts Department of Energy Resources

100 Cambridge Street, 9th Floor

Boston, MA 02114

Dear Dr. Ferguson:

Thank you for the opportunity to provide comments on DOER’s report *Charging Forward: Energy Storage in a Net Zero Commonwealth*. The Union of Concerned Scientists (UCS) is a national nonprofit organization dedicated to advancing science-based policy solutions. UCS has more than 500,000 supporters, including almost 10,000 in Massachusetts.

UCS advocates for a just and equitable transition to a clean energy economy and believes that energy storage – a resource that can help accommodate renewable energy like wind and solar, and reduce demand for fossil fuels – is key to enabling that transition. The 2022 Climate Act provides an opportunity to study the role of energy storage further and, importantly, understand how clean energy resources can benefit communities in Massachusetts.

This new report offers insightful and detailed analysis of the energy storage landscape in Massachusetts, however UCS would like to see more comprehensive research and recommendations that integrate equity and justice.

Low-income communities and people of color are disproportionately overburdened[[1]](#footnote-2) with the negative impacts of fossil fuels. Replacing dirty peaker plants with long duration energy storage is one way to combat this inequity and Massachusetts should prioritize these communities. In order to do so, reports like *Charging Forward* should seek to shed more light on where peaker plants and fossil fuel generators are located. This data must also be transparent in regard to the communities that surround these plants and the cumulative health impacts they face. Whether new developments result in clean energy infrastructure or green spaces, overburdened communities must receive the benefits of reducing greenhouse gas emissions.

The *Charging Forward* report highlights the importance of engaging meaningfully with the local communities but has not been explicit into the barriers to that communication, nor how to overcome them. For example, lack of resources or language accessibility can exclude stakeholders from the decision-making process. Communities should also have transparent information regarding the health, safety and cumulative impacts of the proposed projects. A more nuanced approach to understanding communities’ needs should be explored and that methodology should be outlined. Furthermore, compensation structures for participation should be made more explicit.

The use cases and comparative specifications of long duration energy storage technologies can aid stakeholders in their project selections, and therefore equity and justice considerations should also be included as a qualitative metric. In Maryland, the Public Service Commission approved a measure for the Energy Storage Working Group to consider societal benefits, such as ability to “provide access to reliable and affordable electricity to low- and moderate-income residents, seniors, or schools…” in the potential value streams of energy storage projects.[[2]](#footnote-3) Inclusion of metrics like this can add further context to the benefits of future storage development. UCS has identified many examples of legislative language that enable equitable energy storage practices.[[3]](#footnote-4) Recommendations that include guidelines for equitable language help cement commitment and accountability to these justice principles.

UCS is dedicated to advocating for equitable energy solutions and appreciates the opportunity to provide feedback as part of the stakeholder engagement process with DOER. We look forward to continuing our engagement with the implementation of the 2022 Climate Act.

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Maria Chavez

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Climate & Energy Program

Union of Concerned Scientists

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1. <https://www.cleanegroup.org/peaker-power-plant-data-show-persistent-economic-and-racial-inequities/> [↑](#footnote-ref-2)
2. PC 44 Energy Storage Working Group, In the Matter of the Maryland Energy Storage Pilot Program, Case No. 9619, Submission of the PC 44 Energy Storage Working Group (Dec. 2019) [↑](#footnote-ref-3)
3. https://www.ucsusa.org/sites/default/files/2021-11/Legislative\_Language\_for\_Equitable\_Energy\_Storage.pdf [↑](#footnote-ref-4)