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SENT VIA ELETRONIC SUMBISSION

Mr. Michael Judge  
Director, Renewable and Alternative Energy Division  
Department of Energy Resources  
100 Cambridge St., Suite 1020  
Boston, MA 02114

**RE: Clean Peak Energy Standard (CPS) Stakeholder Questions**

Dear Mr. Judge,

SRECTrade, Inc. appreciates the opportunity to give commentary on the design and implementation of the Clean Peak Energy Standard (“CPS”) in Massachusetts. We applaud the Department’s (“DOER”) continued efforts to decarbonize the grid and involve stakeholders in the implementation process of this exciting new program. As an entity that has been heavily involved in the Commonwealth’s renewable energy markets for over ten years, we believe that we are in a position to provide insightful and meaningful commentary on the eventual design of the CPS program.

SRECTrade provides cloud-based services to the clean energy industry with an expertise in managing, transacting, and processing environmental incentives. The Company’s mission is to accelerate the adoption of renewable energy by providing services and technology that minimize the time, cost, and risk associated with achieving benefits and compliance in clean energy markets. SRECTrade provides agency management and technology solutions to 1.6 Gigawatts (GW) of renewable energy assets across more than 145,000 projects. With nearly half of its asset base located in Massachusetts, SRECTrade has experience operating within the state in tandem with market participants including electricity suppliers and energy utilities, clean energy project developers, installation companies, and individual commercial and residential asset owners.

## **Definition of Key Terms**

### Clean Peak Resource

*Clean peak resource is defined as “a qualified RPS resource, a qualified energy storage system or a demand response resource that generates, dispatches or discharges electricity to the electric distribution system during seasonal peak periods, or alternatively, reduces load on said system.”*

**1. Should only resources interconnected to the electric distribution system be eligible to qualify, or should resources connected to the transmission system also be eligible to qualify?**

The CPS program should focus on establishing a distributed and diverse network of clean peak resources across the Commonwealth. This means that in drafting provisions for the CPS, the DOER should concentrate on the advancement and adoption of distributed, small-scale resources to help promote grid stability and decentralization. The ability to discharge energy during peak hours across a broad geographical and technological spectrum, gives the grid additional support and reliability. SRECTrade recommends that if the DOER decides to include larger scale, grid supply resources in this program, market-factor or value-diluting mechanisms should be used to minimize ratepayer exposure from high-volume credit generating clean peak resources.

**2. Should DOER interpret the use of the term “electric distribution system” to mean that only facilities on the electric distribution system in the Commonwealth should be eligible to qualify as clean peak resources under the CPS? Should the CPS also include all distribution and/or transmission level resources connected in the ISO-NE control area? Should it include adjacent Control Areas such as NYISO, Quebec, or New Brunswick?**

As with the Massachusetts solar carve out and Alternative Portfolio Standard, the DOER should ensure that this program is only available for resources located within the Commonwealth. The program should be designed to prioritize the adoption of local DG systems that benefit the local economy and provide stability to distribution systems within the Commonwealth. Opening the program to transmission level resources in Control Areas outside of the Commonwealth, allows for large systems to flood the market and dilute the program’s effect on local grid stability.

Demand Response Resource

*Demand response resource is defined as “changes in electric usage by end-use customers in the commonwealth from their normal consumption patterns in response to: (i) changes in the price of electricity over time, including, but not limited to, time-of-use rates for residential and small commercial and industrial customers; or (ii) incentive payments designed to induce lower electricity use at times of high wholesale market prices or when system reliability is jeopardized.”*

**3. What types of resources should be included in this definition?**

The DOER should allow any resource that can be intelligently controlled to reduce consumption at peak periods to participate in the program. In evaluating this question, the DOER needs to be cognizant of the fact that technology will advance and expand through the lifespan of this program. The program should be definitive as to what resources can be included, but also as inclusive as possible, to allow for newly developed technologies and mechanisms to participate as they become more prevalent within the Commonwealth.

**4. Should electric vehicles (EVs) qualify?**

In an attempt to bolster electric vehicle (EV) adoption and stabilize the grid through a diversified incentive program, the DOER should allow EVs to qualify for this program. In line with our response to Question 3 above, the DOER should allow any resource that can be intelligently controlled to reduce consumption at peak periods to participate in the program. EVs are projected to have an increasingly significant impact on the grid in next decade. The DOER should implement this provision to control charging patterns and mitigate peak period charging to maximize the environmental benefits related to transportation electrification. The Clean Peak Standard would need to be dynamically adjusted to incorporate this growth in EV adoption to avoid an oversupplied market.

**5. How should DOER interpret the inclusion of different types of rate designs in this definition?**

SRECTrade will defer to other stakeholders to provide insight as to the types of rates designs that should be implemented in relation to demand response resources.

**6. Should this definition only be limited to active demand response?**

The DOER should allow any technology that (1) provides continuous reduction in peak load consumption, or (2) can be called upon proactively to reduce consumption, or (3) provides intermittent consumption reduction, to participate in the program. The DOER should not discriminate against different demand response resources, as long as they provide an incremental benefit to the grid.

**7. Should standalone energy storage resources (i.e. not directly connected to another resource type) be eligible to qualify as demand response resources? What requirements, if any should standalone energy storage resources face in order to qualify as demand response resources?**

As long as a standalone storage resource can verify that it was charged during a lower demand period than when it was discharged, it should be able to qualify as a demand response resource. The DOER should ensure that a clean peak resource of this nature using RECs to claim off-site renewable energy will be differentiated from the same resource being treated as a demand response resource. Battery storage will likely be an integral part of this incentive program and as such, clear lines need to be established surrounding the eligibility and treatment of this resource within the program.

**8. Should the DOER view thermal storage facilities as a Demand Response Resource? What requirements, if any, should thermal storage facilities face in order to qualify as demand response resources?**

While SRECTrade believes the Clean Peak Standard Program should focus primarily on electrical energy, we will defer to other stakeholders to provide insight as to whether thermal storage facilities should be treated as demand response resources.

**Qualified Energy Storage System**

*Qualified energy storage system is defined as “an energy storage system, as defined in section 1 of chapter 164, that commenced commercial operation or provided incremental new capacity at an existing energy storage system on or after January 1, 2019; provided, however, that such system operates primarily to store and discharge renewable energy as defined in said section 1 of said chapter 164.”*

**9. How should DOER define what constitutes “incremental new capacity at an existing energy storage system”?**

The DOER should define “incremental new capacity at an existing energy storage system” as additional capacity installed after January 1, 2019 at an existing energy storage system. The DOER should treat this as they would treat a solar system expansion in the SREC program, interconnected at the same interconnection point.

**10. How should DOER interpret the requirement that a Qualified Energy Storage System operate “primarily to store and discharge renewable energy”?**

- a. Would alignment with the federal ITC requirement that storage is eligible for a credit as long as the battery is charged by a renewable energy system more than 75 percent of the time be appropriate?**

A provision that requires a Qualified Energy Storage System to be charged by a renewable energy system more than 75% of the time would not be appropriate. This requirement could incentivize asset owners to charge their storage system with their renewable energy source during inefficient times causing distortions in the electricity market. Renewable energy system owners may choose to channel electricity into their storage systems at inopportune periods instead of discharging it to the grid to ensure that they meet this requirement. The DOER needs to ensure that the CPS incentive does not create any inefficiencies in the electricity grid which can be avoided through good program design.

- b. If not directly physically or electrically connected to a renewable energy resource, how can the qualified energy storage system demonstrate that it operates primarily to store and discharge renewable energy? Purchase and retirement of RECs? Some other means?**

The DOER should establish a “book-and-claim” process to associate energy discharged from a qualified energy storage system with renewable-sourced electricity, generated off-site. The DOER should look to the California Air Resources Board (CARB) and their “book-and-claim” provisions in the California Low Carbon Fuel Standard (LCFS) program as an example.

The LCFS program allows electric vehicle fleet operators and charging station owners to purchase and retire unused Renewable Energy Credits (RECs) to supplement discharged electricity from their charging station. CARB recognizes each MWh of dispensed electricity matched with an eligible REC, as electricity with a carbon intensity of zero, even though the renewable electricity is not produced on site. The DOER should emulate this process to build out a dynamic and flexible CPS compliance market that bridges multiple compliance programs in the Commonwealth. The utilization of RECs to supplement dispensed energy from a qualified energy storage system would increase the demand for Class I & II RECs, creating a more balanced dynamic across both markets. In a situation where the CPS credit market is undersupplied and the REC market is oversupplied, participants would cost-effectively purchase RECs to supplement an increased CPS credit production. This natural equilibrium between the two markets would echo a sentiment of price stability among investors, leading to further adoption and growth for both renewable and clean peak resources across the Commonwealth.

**11. How should DOER view thermal storage facilities with respect to eligibility as a qualified energy storage system?**

While SRECTrade believes the Clean Peak Standard Program should focus primarily on electrical energy, we will defer to other stakeholders to provide insight as to whether thermal storage facilities should be eligible to qualify as an energy storage system.

## Qualified RPS Resource

*Qualified RPS Resource is defined as “a renewable energy generating source, as defined in subsection (c) or in subsection (d) of section 11F that has: (i) installed a qualified energy storage system at its facility; or (ii) commenced commercial operation on or after January 1, 2019.”*

**12. Given the requirement that RPS resources that commenced commercial operation prior to 2019 must be paired with a qualified energy storage system in order to qualify for the CPS, what, if any, requirements should DOER adopt regarding how much energy storage needs to be installed?**

**a. Should there be a minimum percentage threshold on the ratio of the size of the energy storage to the size of the renewable resource (e.g. minimum installed storage capacity equal to 25% or more than installed renewable capacity)?**

The DOER should ensure that no eligibility threshold ratio of RPS resource to storage capacity should exist. The CPS incentive should be based purely upon the output of dispensed electricity from the storage unit and should not discriminate against retroactive RPS resources (installed prior to 2019). From the perspective of the grid, a renewable resource able to supply electricity for 50% of the peak period with a large supplemental battery to provide electricity for the remaining 50% has the same benefit as a renewable resource of the same capacity, supplying power for 90% of the peak period, with a small battery providing electricity for the remaining 10%. As such, the DOER should approach this question as a matter of benefit to the grid, which would mean allowing any sized storage unit to supplement any RPS resource and still qualify for the program.

**13. With respect the quantity of its capacity that a Qualified RPS Resource can qualify under the CPS, should the DOER discount a Qualified RPS Resource’s eligible capacity based on the capacity it can supply through the duration of each seasonal peak period (e.g. a 2 MW solar resource that can only provide 50% of its capacity value over the peak period would qualify as a 1 MW facility)?**

SRECTrade will defer to other stakeholders to provide insight on this matter.

**14. Should DOER adopt any additional requirements regarding the CPS eligibility of renewable energy generating sources as defined in subsection (c) or in subsection (d) of section 11F (e.g. emissions thresholds, fuel sourcing, etc.)?**

SRECTrade will defer to other stakeholders to provide insight on this matter.

## **Seasonal Peak Periods**

### Establishing Seasonal Peak Periods

*DOER is required to establish seasonal peak periods, which are defined by that statute as “the daily time windows during any of the 4 annual seasons when the net demand of electricity is the highest; provided however, that a seasonal peak period shall be not less than 1 hour and not longer than 4 hours in any season, as determined by the department.”*

**15. Given these limitations, how should DOER establish different seasonal peak periods to both optimize cost reductions for ratepayers and emissions reductions for the Commonwealth?**

This is not within SRECTrade's domain of expertise, so we will defer to other stakeholders with a firmer grasp on electricity markets and grid dynamics.

**16. DOER is considering announcing seasonal peak periods on an annual basis based on 1 to 3 years of historical data.**

**a. What formula should DOER use to set the seasonal peak periods to reflect real time operating conditions?**

While the DOER should evaluate changes in seasonal peak periods on an annual basis, there should only be changes to the definition in seasonal peak periods if the actual change is statistically significant. This would avoid a scenario where a clean peak resource built a project under a certain revenue assumption from the CPS, only to have the revenue stream wiped out after two years of participation in the program due to a shift in the defined season peak period. As such, the DOER needs to be very careful about adjusting key parameters of the program on a regular basis.

**b. What data sources should DOER use to determine seasonal peak periods?**

SRECTrade will defer to other stakeholders on this matter.

**c. What time period(s) should each of the 4 annual peak periods cover?**

SRECTrade will defer to other stakeholders on this matter.

**d. Should seasonal peak periods be different lengths depending on the season?**

SRECTrade will defer to other stakeholders on this matter.

**e. How often should the seasonal peak periods be examined and/or adjusted to reflect changes in seasonal peak demand over time? What should be the trigger and/or the process for making such adjustments?**

Please see Question 16(a).

**17. Are there alternative methods of establishing seasonal peak periods the DOER should consider?**

SRECTrade will defer to other stakeholders on this matter.

Atypical Peak Events

*Not all system peaks occur within the same 1-4 window throughout the course of a season (e.g. a 95 degree day on a weekday in May will almost certainly not have a peak that occurs at a similar time of day as the bulk of peak periods in the same month).*

**18. Should DOER establish peak periods other than the seasonal peak periods during which clean peak resources are eligible to generate clean peak certificates?**

- a. If so, what criteria should DOER use to establish these periods and what mechanism(s) and should be used to trigger and announce these events in advance of them occurring?**

As long as these atypical peak periods do not interfere with the established seasonal peak periods, SRECTrade sees no issue in adding this added opportunity for clean peak resources. SRECTrade will defer to other stakeholders to provide suggestions as to the calculations of these atypical peak periods.

- b. Should DOER specifically target ISO system peaks?**

SRECTrade will defer to other stakeholders to provide suggestions.

## **Generation of Certificates**

*Some clean peak resources may only be capable of generating clean peak certificates during a portion of a seasonal peak period. For example, a solar resource trying to deliver energy for the duration of a summer seasonal peak period that lasts from 6-9 PM may generate a significant number of certificates in the early part of that window compared to the latter.*

**19. Should only resources that can provide value for the entire duration of a peak period be able to generate certificates?**

The DOER must allow all resources that produce energy during the peak period to generate certificates. A restriction of eligibility for systems that only generate electricity during the entirety of the peak period would disqualify most technologies and discriminate against distributed storage systems that may not have the storage capacity to discharge energy during the entire duration of the peak period. This would effectively stunt the development of the program and hinder adoption of distributed technologies that would otherwise be eligible.

**20. Should there be different values provided to resources that can provide value for a portion of a peak period versus the entire peak period? If so, how should DOER differentiate these value streams?**

Understanding that this mechanism would help increase grid stability, SRECTrade encourages the DOER to establish an added incentive for those resources that can cover the entire peak period with energy. With this being said, SRECTrade stresses that the DOER do so as not to harm the revenue stream for distributed assets that may not be able to cover the entire peak period. The DOER must be conscious of the economics of scale of qualified clean peak resources so as not to over-incentivize large scale resources that have the ability to cover the entire peak period, and potentially oversupply the market.

In addition, the DOER should be wary of incentivizing systems to slowly discharge their electricity over the entire course of the peak period. This may not yield the most cost-effective and grid stabilizing

outcome. SRECTrade will defer to the DOER to decide whether this effect would be more or less beneficial to the grid.

**21. Should there be a penalty (i.e. negative credits) if a resource under-produces during the actual monthly peak?**

There should not be a penalty for a resource under-producing during the actual monthly peak. This would be detrimental to the wellbeing of the program and would deter asset owners from participating. SRECTrade would like to stress that the DOER must ensure that the incentive for clean peak resources is based on actual output of the system as opposed to potential output or capacity.

**22. How should resources participating in other state programs (e.g. section 83 procurements, SMART, EE programs, etc.) interact with the CPS?**

This should be an additional incentive and reward for supply energy during peak period, that does not discriminate based on the programs that the asset already takes part in.

**23. Should qualified energy storage systems that can demonstrate they were charged during minimum load windows be provided additional incentives or benefits under the CPS? If so, how should these be structured and how should minimum load windows be established?**

DOER should make sure to clarify whether a resource that is categorized under this header would be treated as both a demand response resource (reference Question 7) and a clean peak resource.

Establishing adders for qualified energy storage systems that can demonstrate they were charged during minimum load windows would be appropriate so long as these adders do not detract from the value received by a qualified energy storage system that is *not* charged during minimum load windows. These could be established in the form of multipliers that are implemented in the same way as market factors are implemented in SREC-II. SRECTrade will defer to other stakeholders as to the multiplier that should be applied in these instances and how minimum load windows should be established.

## **Metering**

### Verification of Metered Data

*DOER proposes that all clean peak resources be registered with NEPOOL GIS as Non-NEPOOL participants. This would mean that, as required by the NEPOOL GIS operating rules, all resources would be required to report their eligible output to NEPOOL GIS by a DOER approved Independent Third Party Meter Reader. This entity would be responsible for verifying the accuracy of the reported data before uploading it to NEPOOL GIS for the creation of certificates.*

*To ensure that all data is collected, reviewed, and reported to NEPOOL GIS in a consistent manner, DOER would select a single entity to act as the Independent Third-Party Meter Reader, similar to the process used under the SREC programs, in which the Production Tracking System at the Massachusetts Clean Energy Center serves in this role.*

**24. Do you support this proposal? If not, please describe why.**



SRECTrade supports the proposal to establish an Independent Third-Party Meter Reader for the program, similar to the MassCEC PTS in the SREC programs. This would allow accessibility to the program for smaller distributed generation systems that may not have the financial flexibility to procure an independent verifier.

**25. If DOER procures the services of a single Independent Third-Party Meter Reader:**

**a. What criteria should DOER use to evaluate the capabilities of the entity that is selected to act as the Independent Third-Party Meter Reader?**

As with any independent verifier, the Independent Third-Party Meter Reader should be completely independent from any special interest or participant within the program. Just as importantly, the entity selected should be one that has demonstrated its competence in similar past engagements from both an operational standpoint and a technological standpoint.

**b. Do you support the establishment of a fee structure to support the ongoing services provided by the Independent Third-Party Meter Reader?**

The Independent Third-Party Meter Reader should be appropriately compensated by the DOER to ensure they provide a quality of service to the highest degree.

**c. How should this Third-Party verification take place?**

SRECTrade will defer to other stakeholders on this matter.

**Metering Specifications and Requirements**

*Because clean peak certificate creation is dependent not just on the quantity of energy output, but also its timing, more sophisticated metering will be required than that which is required for many RPS eligible systems, which only require monthly meter reads.*

**26. Describe in as much detail as possible the metering standards and requirements (type, accuracy, etc.) that DOER should employ to ensure the accurate collection of data.**

Due to the metering complexities of the program, SRECTrade strongly suggests that the DOER require high level, yet cost-effective metering that incorporates online monitoring and API linking. There should be a streamlined approach to data/production extraction, which requires as little reliance on the asset owner as possible. With the timing aspect of metering essential to the program, the DOER will want to ensure that manual entry errors on asset owners' end are limited. It would be appropriate to establish similar metering standards in this program as with the SREC programs while ensuring that DAS providers are able to report time-stamped production for verification of peak-period generation.

**27. Should different standards apply to different sizes and types of facilities? If so, please describe your recommendations in as much detail as possible.**

SRECTrade recommends that the DOER follows similar standards as to the SREC programs.

**28. What other verification mechanisms could be deployed to simplify the process, particularly for small-scale systems for which some types of metering solutions may be cost-prohibitive?**

With most DAS providers that provide an online monitoring system with their service, time-stamped metering is provided in the online portal. In an ideal scenario, DAS providers would open up APIs to be able to extract readings during peak and non-peak load periods. Alternatively, the asset owner would be able to download time-stamped reports from their online portal to verify their eligible production. The DOER should ensure that small-scale clean peak resources would be able to utilize these cost-effective metering services to provide verifiable production data to the designated Third Party Meter Reader.

## Value of Certificates

*DOER must establish an alternative compliance payment rate and potentially other mechanisms that will help establish the value of clean peak certificates. Please describe in as much detail as possible:*

**29. How much value is likely needed on a per MWh basis to incentivize different types of existing resources to operate during peak windows and/or new resources developed or financed using CPS revenue streams?**

The DOER should conduct a full, comprehensive cost-benefit financial analysis to determine the monetary value that would be needed to provide a battery storage system with enough cash flow to give its owner a sufficient return on investment (ROI).

**30. How should DOER establish these values?**

Please see the response to Question 29 above. The market should be designed similarly to the SREC market, with an established Alternative Compliance Penalty (ACP) and a Credit Clearinghouse Auction (CCA). The success of the SREC market in Massachusetts has proven the efficacy of these market mechanisms, which have ensured a stabilized market that has driven a healthy adoption rate.

## Long-term Contracts

*In establishing certificate values, DOER “may include a process by which electric distribution companies competitively procure clean peak certificates from clean peak resources and enter into long-term contracts, subject to the approval of the department of public utilities.”*

**31. If DOER does require competitive procurements:**

- a. What types of facilities should be able to participate in solicitations? Should it be limited to certain types of facilities (e.g. facilities that are either new and/or not already supported by another type of long-term contract or financing tool)?**

SRECTrade suggests that the DOER limits the amount of competitive procurements for long-term contracts. It is essential that the DOER allows for a flexible, market-based mechanism to be the predominant mechanism to establish pricing and demand within this program. If the DOER does allow for these procurements to take place, they should only apply to large resources that would benefit from a steady cash flow for financing purposes.

**b. How frequently should solicitations take place?**

As long as these procurements are small and do not affect the spot market pricing of credits, SRECTrade will defer on this matter to other stakeholders.

**c. How large should the procurements be (e.g. percentage of total load or annual requirement)?**

Please see Question 31 (b) above.

**d. How should the contract price be established? Pay as bid? Reverse auction mechanism with a single clearing price for all resources? Other?**

SRECTrade will defer on this matter to other stakeholders.

Post-2019 Minimum Standard Requirements

*DOER has established a baseline Minimum Standard requirement of 0% for 2019. Each year after 2019, DOER is required to establish a Minimum Standard requirement for retail suppliers that increases at a rate of at least 0.25% of total retail sales annually.*

**32. What methodology should DOER use to establish post-2019 Minimum Standard requirements (e.g. fixed annual requirements in a published schedule, supply reactive formula, other)?**

The DOER should implement a supply reactive formula to establish post-2019 Minimum Standard requirements for the CPS program. As proven in the SREC programs, this methodology creates a balanced market dynamic that promotes investor confidence and a fluid adoption rate. With the diversity of the program involving rapidly advancing technologies, the DOER may have a hard time projecting supply numbers well into the future to establish a fixed annual schedule. As shown in other fixed annual requirement markets in the PJM SREC markets, this could lead to large swings in over and under supply and regular regulatory reviews. A supply reactive formula would allow the DOER to make a much more accurate estimate as to the following year's supply, creating price stability within the market.

**33. How large should the minimum standard be?**

The minimum standard should be large enough to create attractive pricing and allow for rapid technology adoption and growth.

Demand Response Resource Carve-out

*Separate from the total Minimum Standard requirement, DOER is required to establish "a minimum percentage of clean peak certificates that must be derived from demand response resources."*

**34. How should DOER interpret this requirement?**

Due to the fundamental differences between demand response resources and clean peak resources, the carve out should be kept completely segmented from the total Clean Peak Minimum Standard.

**35. What methodology should DOER use to establish this carve-out of the larger Minimum Standard?**

SRECTrade will defer to other stakeholders to provide insight on this matter.

Other

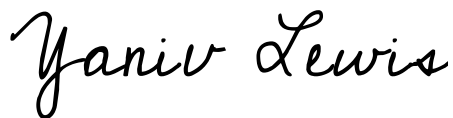
**36. Please discuss any other implementation issues not addressed above.**

SRECTrade would like to stress the importance of differentiation between a capacity-based incentive and an output-based incentive. Some of the questions outlined by the DOER insinuate that the Clean Peak Standard incentive will be based on the *ability* of a resource to provide renewable energy to grid at peak load periods as opposed to the *actual* output of those resources during peak periods.

In addition, the DOER needs to clearly differentiate the treatment of demand response resources and clean peak resources in the program. While the regulations to require a “carve-out” for demand response to be established, the DOER needs to understand that the fundamental characteristics of the two resource types are quite different. Demand response reduces peak load consumption and attempts to “smooth” the demand curve, while clean peak resources provide clean energy during peak load times. As such, the DOER needs to examine how the eligibility and treatment of these two resources will interact within the program. In addition, in certain instances, a resource can be interpreted as both a demand response and clean peak resource. For example, a qualified storage system charged with renewable energy can be defined as both. The DOER will need to clearly define how a resource like this would be treated. While SRECTrade is not in a position to give specific recommendations as to how the DOER should approach this matter, we are concerned with the overlapping eligibility of such vastly different resource types.

Respectfully,

Yaniv Lewis

A handwritten signature in black ink that reads "Yaniv Lewis". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Associate, Environmental Markets  
SRECTrade, Inc.

Tom Mackenty

A handwritten signature in black ink that reads "Tom Mackenty". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Director, Business Development  
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