

From: Geoff Gunn <geoff.gunn@arup.com>
Sent: Tuesday, February 5, 2019 7:37 AM
To: DOER, CPS (ENE) <DOER.CPS@mass.gov>
Subject: Clean peak stakeholder question responses

Hi,

Thanks for the opportunity to comment, please see below for our thoughts on many of the questions posed. I hope this input is helpful.

- Geoff

1 – No, resources connected with the transmission system are equally able to meet the overall objectives of the CPS.

2 – No, this should be fully evaluated. Allowing resources which are connected to ISO-NE seems a good way to ensure that the regional goals are met while still getting an overall economic benefit to the state.

3 – Measurable load-reduction technologies which do not produce carbon should be considered, such as: lighting controls, HVAC setbacks, etc.

4 – Yes, EVs should be considered. Although I don't believe there are many commercially available EV's which could meet the requirements, the program should be forward looking in order to enable these operations once available.

7 – Yes, but provisions need to be included (such as REC retirements) to ensure that they are charged in a low-carbon manner.

8 – This should be considered, but will need provisions for ensuring they are charged in a low-carbon manner.

10a – This seems a reasonable approach, alternatively a proxy for grid carbon content could be used, but this would require TOU metering, and may be too difficult to implement.

10b – Purchase and retirement of RECs seems a reasonable option. Ideally the credit should be tied to carbon content of the grid at the time of charging, however this would require carbon price signals, and metering tariffs which are not yet in place.

11 – Provided that thermal energy storage is charged with renewable energy sources, and the discharge can be shown to lower overall grid use, then yes, these resources should be included.

12a – I don't think there needs to be a correlation (provided the RPS resource has the capability to fully or mostly charge the energy storage resource with renewable energy). The CPS should be setup to provide revenue to the clean peak resource. In particular, if stand-alone energy storage resources are allowed, it does not make sense to require a specific sizing criteria for paired resources.

13 – Yes, the resource should have to provide power throughout the entire peak, and should be compensated accordingly with its ability to meet this requirement.

19 – Yes, only resources which can provide value for the entire duration should be able to generate certificates.

20 – No, see 19.

21 – Yes.

22 – Consider providing a guaranteed value of CPS and subtracting based on other incentives (similar to how SMART operates with the utility rates).

23 – Ideally the charging and discharging requirement/rates should be based on carbon content of electricity used/provided. Since these pricing signals don't currently exist a proxy based on typical grid carbon content for various load levels should be used. These values should be re-evaluated on an annual basis as the grid mix/profile changes.

31a – The procurement should allow aggregators to bid in. There is a significant potential for small scale residential systems which, other than SMART, don't have ready access to revenue streams. Allowing aggregators provides the ability to unlock this market, which I believe has pent-up demand.

36 – The incentive should be structured such that it can work with existing incentives and programs wherever possible to allow for value stacking.

[Geoff Gunn](#) PE LEED AP
Associate | Electrical

Arup
60 State Street Boston MA 02109 USA
t: +1 617 864 2987 d: +1 617 349 9289
m: +1 415 691 5573
www.arup.com

Connect with me on [LinkedIn](#)

Electronic mail messages entering and leaving Arup business systems are scanned for viruses