



Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON, MA 02133-1054

THOMAS A. GOLDEN, JR.
16TH MIDDLESEX DISTRICT

CHAIRMAN
Committee on Telecommunications,
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Ms. Judith Judson – Commissioner
Department of Energy Resources
100 Cambridge St., Suite 1020
Boston, MA 02114

Dear Commissioner Judson:

Thank you for the opportunity to provide comments in response to stakeholder questions circulated by the department. As Chairman of the Joint Committee on Telecommunications, Utilities, and Energy during the 190th General Court, I had the privilege of working with Speaker Deleo and the Baker-Polito Administration to enact *An Act to advance clean energy*. The bill set a national precedent as the first piece of legislation to put a Clean Peak Standard (CPS) into statute. I applaud the department for initiating a robust stakeholder process to solicit input on how to cost-effectively reduce emissions using the CPS, and I look forward to the ongoing development and implementation of the program.

I would like to submit the following points for the department's consideration:

- The CPS should include resources that are connected to the transmission system in addition to the distribution system. The goal of the legislature in enacting the Clean Peak Standard was to reduce high-cost peak hours by displacing high-emitting resources with clean peak resources. Allowing transmission-connected resources to participate will enable those resources to displace peaker plants, thereby reducing costs and emissions.
- The CPS should include standalone storage as an eligible resource to participate in the program. Standalone storage can play an important role in lowering our emissions during peak hours, and with the appropriate safeguards, can function as a viable resource alongside other clean peak resources.

I appreciate the time and effort that you and your team are putting in to promulgate this innovative program, and thank you for your consideration of my comments.

Sincerely,

Thomas A. Golden, Jr.
State Representative
16th Middlesex District