

Commissioner Judith Judson
Massachusetts Department of Energy Resources (DOER)
100 Cambridge Street, Suite 1020, Boston, MA 02114

Friday April 12th, 2019

Dear Commissioner Judson,

I write to you as a representative of the Climate Action Business Association (CABA) in regards to the proposed Clean Peak Standard (CPS) as presented on April 2nd, 2019. CABA is a Massachusetts-based nonprofit business association which works with our members to promote clean energy deployment, advocate for policies reducing greenhouse gas emissions, further shared goals of climate resilience, and improve internal sustainability in the private sector.

Clean peak reductions have been a particular focus of ours since legislation was first proposed in 2017. As we see it, CPS is an important tool in ensuring Massachusetts achieves its emissions reduction requirements while realizing cost reductions for electricity consumers, both residential and business. Therefore, as we see it, the purpose of this policy is to support cost-effective reductions in greenhouse gas emissions during peak periods of energy use.

To this end, we are encouraged by the inclusion of a number of the technical considerations within the proposed CPS. Among them:

- A recognition of the need for annual evaluations of any CPS seasonal window. This allows said windows to be shifted as climate change impacts the traditional start and end dates of seasons here in the northeast.
- The introduction of multipliers with the stated goal of concurrently increasing local grid resilience, along with peak reductions.
- An active focus on reducing emissions per MWh generation.

In completing the draft regulation we recommend the following:

- A strong multiplier for grid resilience, on the order of magnitude of three times.
- Competitive prices for any Alternative Compliance Payment (ACP), with the goal of effectively driving deployment of clean peak reduction technologies in Massachusetts.



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We are closely following your proposal to create new power generation procurements through the CPS. In crafting rules around new CPS procurements, we encourage DOER to avoid incentivizing electricity sources that are both carbon-intensive and expensive for consumers.

Finally, we are in alignment on the need for a focus on cost reduction, but trust that DOER will balance this with the important policy goal of reducing carbon emissions during peak demand periods. We are eager to review further analysis on this from the designated consultants.

Once the draft regulation is released, we look forward to subjecting it to deeper analysis and providing additional comments. Thank you for your work on this important topic.

Sincerely,

Timothy J. Cronin

Policy & Partnerships Manager

Climate Action Business Association (CABA)