



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

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April 12, 2019

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

Re: Clean Peak Standard Straw Proposal

Dear Commissioner Judson:

TechNet is the national, bipartisan network of over 80 technology companies that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50 state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents more than three million employees in the fields of information technology, e-commerce, clean energy, telecommunications, gig economy, sharing economy, venture capital, and finance. TechNet is committed to advancing the public policies and private sector initiatives that make the U.S. the most innovative country in the world.

TechNet greatly appreciates the hard work of the Department of Energy Resources (DOER) and the time and efforts to thoughtfully develop a clean peak standard (CPS). TechNet respectfully submits the following comments in response to the DOER's CPS Straw Proposal.

TechNet is strongly supportive of the proposed resiliency multiplier. Electricity is the lifeblood of the technology economy, not just electricity that is economical and clean, but electricity that is *successfully delivered without interruption*. The use of this adder will help encourage technology companies to develop projects that reduce GHG emissions from the dirtiest hours of grid operations AND mitigate the risk of service interruptions.

Additionally, TechNet reiterates its strong opposition to the idea that eligibility of demand response resources should be to renewables only. As we stated in our February 2, 2019 comments in response to stakeholder questions, climate change and air quality impacts are driven by the amount of emissions released into the atmosphere, not ideology. Instead, DOER should evaluate eligibility based on comparative emissions levels of GHGs and criteria air pollutants to ensure that incentivized activity does in fact result in reduced emissions.

Thank you in advance for your consideration on these matters. Please do not hesitate to reach out if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Christina Fisher".

Christina Fisher
Executive Director, Northeast
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