

April 12, 2019

Massachusetts Department of Energy Resources
100 Cambridge St Suite 1020
Boston, MA 02114

Re: Clean Peak Standard Straw Proposal – Stakeholder Feedback

Zero Point Development, Inc. and its affiliates (collectively “Zero Point”) thanks the Massachusetts Department of Energy Resources (“Department”) for this opportunity to submit comments with regard to the Clean Peak Standard Straw Proposal.

I. INTRODUCTION

Zero-Point is a central Massachusetts based renewable energy company that currently develops solar photovoltaic (PV) arrays in Massachusetts. Zero-Point has successfully developed, installed and maintained 36 commercial rooftop projects totaling approximately 500KW, approximately 40MW of commercial ground mount arrays and has 154MW of commercial ground mount arrays under construction. Zero-Point has seen rapid growth in the company’s size and capabilities and plans to continue to grow its operations by hiring more employees and investing more capital to develop additional solar capacity. Zero-Point also plans to invest in helping the Commonwealth realize the full potential of renewable energy through the appropriate development and use of energy storage, subject to the stability and availability of the relevant renewable energy programs such as the Clean Peak Standard. Zero-Point strongly supports the Commonwealth’s goal to provide continued support of solar power generation and a stable and equitable solar market at a reasonable cost to ratepayers.

II. REPLY COMMENTS

On April 2, 2019, the Department released its Clean Peak Standard Straw Proposal and requested written comments from interested Stakeholders.

Zero-Point supports this proposal and would like to make the following recommendations regarding its implementation.

- Municipal Light Plants:

Customers served by Municipal Light Plants contribute to the peak load, and thus the overall cost of power during peak period. These areas represent unused resource locations and could remove some of the burden on heavily utilized infrastructures.

They would also benefit from the contribution to upgrade their electrical infrastructures. Since Clean Peak and Demand resources can benefit the Commonwealth by being connected directly to Transmission. Consideration should be given to allow these resources to be connected within municipalities while being compensated as resources connected directly to transmission.

- Non Co-Located Energy Storage:

The same Clean Peak benefit can be achieved by coordination with energy storage resources that are located near, but not necessarily on the same or adjacent parcel, as existing Solar generators. They can be considered “Paired” with the solar generator if their action is coordinated to absorb the generation of the solar facility as it is produced. This would allow existing systems to participate in the program that do not have the space available for the storage system on the current parcel.

- Clean Peak Windows:

Consideration should be given to create adders for storage systems that are mandated by the EDC to discharge at hours outside the globally chosen Clean Peak Window to match peak load times of the particular feeder or network area. This would also incentivize locating resources in areas that would allow the EDC to defer additional investments.

III. CONCLUSION

Zero-Point appreciates the opportunity to provide these comments and respectfully requests that the Department consider these recommendations.

Sincerely,



Greg Hunt
Principal