



April 10, 2019

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

Submitted electronically to: DOER.CPS@mass.gov

RE: Stakeholder Comment Regarding Clean Peak Standard Straw Proposal

Dear Commissioner Judson:

On behalf of the Environmental League of Massachusetts (ELM) I appreciate the opportunity comment on the Department's Clean Peak Straw Proposal.

The urgent challenge to transition away from fossil fuels to a clean energy future demands ambitious solutions. We are encouraged by the Department's efforts to address clean alternatives to meet peak power demands. ELM believes that reducing peak demand and increasing renewable resources are necessary to combat climate change and reduce the need for additional fossil fuel infrastructure.

ELM offers comments on the following elements of the Clean Peak Straw Proposal:

1. Clean Peak Certificates (CPCs)
 - a. Multipliers – Core Design Elements
 - i. DOER should consider a larger seasonal multiplier for the Winter Peaks instead of having the same multiplier for summer and winter periods. ISO New England and others have demonstrated a significant need to address winter peak hours. During these times, natural gas pipelines can be constrained leading to the dispatch of dirtier fossil fuels such as oil and coal. The greatest price spikes also coincide with winter peak hours. Therefore, it seems logical to provide clean peak resources that can address winter peak issues with a greater incentive than in other seasons.
 - b. Multipliers – Policy Enhancement
 - i. DOER should consider policy enhancements similar to those under the SMART program regarding location of resources. Under SMART, solar resources located on brownfields or on existing buildings receive greater incentives than those located on greenfields. The same should hold true for the Clean Peak resources.
 - ii. DOER should consider changing the proposed "Minimum Load Negative Multiplier" to a positive multiplier for resources that are able to meet the steep ramp rates needed to move from low power demand hours occurring in mid-

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day due to solar resources, to the evening peak. These steep evening ramps are challenging for grid operators as many generators, mainly natural gas fired, need to be positioned to meet this steep ramp as the sun goes down. Having an incentive for Clean Peak resources to meet power demand during the late afternoon ramp would result in environmental and economic benefits.

2. Clean Peak Certificate Procurement

- a. The Department's straw proposal indicates that it is considering a procurement process based either on utility tariffs or on form contracts with each selected project. ELM believes that the use of a tariff is likely to be administratively easier and therefore we suggest DOER explore this option as the primary mechanism for procurement.

We thank you for considering our comments and look forward to working together to ensure responsibly developed clean peak resources a major role in the Commonwealth's energy future.

Sincerely,

Eric Wilkinson
General Counsel and Director of Energy Policy