



**Great River Hydro**

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Massachusetts Department of Energy Resources  
One Winter Street  
Boston, MA 02108

VIA EMAIL: [DOER.CPS@mass.gov](mailto:DOER.CPS@mass.gov)

**RE: DOER Clean Peak Standard Straw Proposal Comments**

Dear Commissioner Judson:

Great River Hydro, LLC ("Great River Hydro") appreciates the opportunity to respond to the Massachusetts Department of Energy Resources ("DOER") request for written comments in the above-referenced proceeding.

Great River Hydro owns and operates thirteen conventional hydroelectric generating facilities located on the Connecticut and Deerfield Rivers in Massachusetts, Vermont and New Hampshire. At a nominal rating of 584 MWs, our portfolio of forty-three generating units produces approximately 1.5 GWHRs of carbon-free generation annually. Many of these units provide the ISO New England system with a reliable source of hourly operating reserves as well as play an integral role in the grid's system restoration procedures.

To preface our comments on the Clean Peak Standard ("CPS"), Great River Hydro believes that out-of-market mandates are negatively impacting market drivers that would otherwise be encouraging growth and development of clean energy generation<sup>1</sup>. The market continues to evolve to respond to changing needs in the marketplace, but actions outside of that process dampen the ability of suppliers to respond. With this point in mind, Great River Hydro is compelled to comment on DOER's Clean Peak Standard Straw Proposal to assure that the program provides as balanced and fair of a process to assure the most competitive structure both for participants and for ratepayers alike.

Consistent with prior written comments, Great River Hydro was encouraged to see DOER include transmission-connected resources located in the ISO-NE control area as qualifying eligible resources. We also support the inclusion of existing (pre-1/1/2019) RPS Class I/II resources that are paired with new energy storage facilities, especially given the proposal includes eligibility for all electricity delivered by the pair during Seasonal Peak Periods to generate Clean Peak

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<sup>1</sup> ISO-New England, "Accommodating State Clean-Energy Goals within the Competitive Marketplace", <https://www.iso-ne.com/about/regional-electricity-outlook/grid-in-transition-opportunities-and-challenges/public-policies-and-markets>

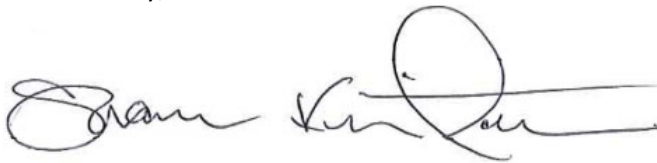
Certificates. This is a fair way to include existing resources while meeting the objectives of the Clean Peak Standard. However, Great River Hydro strongly recommends reducing the paired storage requirements for existing resources; 25% of nameplate power of the facility and 4-hour duration of storage are very high bars that will limit participation and discourage smaller storage resources that could be helpful for reliability and resilience. Great River Hydro recommends DOER considers lower thresholds for paired storage both in capacity and duration to maximize participation. At a minimum, DOER should consider a graduated approach to capacity and duration requirements to allow a broad spectrum of existing resources to participate and compete in the market.

Also, the CPS Straw Proposal suggests that incremental pumped storage capacity would be considered as a “Qualified Energy Storage System.” It is unclear how incremental pumped storage capacity would be measured or metered because it would only be “new” and “incremental” when the pumped storage facility can show it is producing more MW’s in a given hour than it could have absent the incremental capacity. We believe this can be done, but we also believe that if it can be done for pumped storage then it can also be done for conventional hydropower – especially conventional hydropower that has weekly or seasonal storage capacity. These resources have discretion with how and when these stored energy reserves are used. Existing conventional hydropower could use this excess pondage to generate at higher rates than established historical norms during Seasonal Peak Periods. DOER should consider this incremental generation qualifying for Clean Peak Certificates as it would for pumped storage.

Further, hydro generation provide necessary system reliability attributes like operating reserves and frequency response that intermittent wind and solar assets are unable to provide. These attributes facilitate the penetration of those nonsynchronous intermittent resources into the market – a value that should not be overlooked<sup>2,3</sup>.

Thank you for the opportunity to comment on DOER’s Clean Peak Standard Straw Proposal.

Sincerely,



Shawn Keniston  
*Vice President, Operations*



Brandon Kibbe  
*Manager of Strategic Initiatives*

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<sup>2</sup> ISO-New England, “Integration of Renewable Resources and Other New Technologies”, <https://www.iso-ne.com/about/regional-electricity-outlook/grid-in-transition-opportunities-and-challenges/integration-of-new-technologies>

<sup>3</sup> RTO Insider: ISO-NE Planning Advisory Committee Briefs: March 21, 2019 March 24, 2019, “EIPC Frequency Response Update”, <https://www.rtoinsider.com/iso-ne-pac-march-2019-113429/>