



**Commonwealth of Massachusetts**  
**Department of Energy Resources**  
Clean Peak Standard Straw Proposal Comments

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

Date: 12 April 2019

Dear DOER Clean Peak Standard Team,

On behalf of GlidePath Power Solutions, I am pleased to provide the following comments in response to the Clean Peak Standard Straw Proposal.

- GlidePath Power Solutions is a clean generation and battery storage developer with over 1GW of storage capacity in development and 400MW of wind, solar, and battery storage in operation. GlidePath is exploring opportunities to deploy battery storage projects across the Commonwealth of Massachusetts.
- GlidePath strongly supports the Massachusetts Department of Energy Resources' (DOER) Clean Peak Straw Proposal. DOER's proposal will accelerate the integration of battery storage assets in Massachusetts and further advance the Commonwealth's climate and emissions goals.
- In particular, GlidePath supports the resilience multiplier, which would reward developers for configuring resources to provide resilient power in the face of transmission and distribution system outages. While distributed resources are often capable of providing this service, developers rarely configure them to do so when the resilience benefit is not valued in the market. The resilience multiplier provides the necessary incentive for developers to invest in DERs that can support critical needs during emergencies.
- GlidePath is at the forefront of clean, resilient solutions for communities, businesses, and military installations. We commend Massachusetts for its efforts to improve energy resilience throughout the Commonwealth and its demonstrated leadership for other states to follow.

We would welcome the opportunity to discuss any of the points above as you continue to formulate the Clean Peak Standard.

CC:

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Respectfully,

A handwritten signature in black ink, appearing to read "Kevin Johnson".

Kevin Johnson

GlidePath Power Solutions

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