



April 12, 2019

Kaitlin Kelly  
Department of Energy Resources  
100 Cambridge Street  
Boston, MA 02114

DOER.CPS@mass.gov

Re: Clean Peak Standard Comment Letter

Dear Kaitlin:

After reviewing the initial Clean Peak Standard Straw Proposal, our comments focus on the following:

- 1) Since the Clean Peak Standard is new and will be initially small in relative scale; an argument could be made that since ISO-NE has between 12%-16% of renewables charging the grid, even in the evening hours, standalone systems could be charged with renewables from the grid and discharged during Peak hours. In this way, investors could make satisfying the Clean Peak Standard with standalone systems a business strategy.
- 2) Large-scale solar system program design in the extended SMART program should require that all large-scale solar systems be designed to at least qualify to participate in the Clean Peak Standard program.
- 3) As the Clean Peak Standard is developed, DOER should be cognizant of metering and compliance obligations that increase operating cost for the Clean Peak operator. To as large extent as possible automated system design and simple program requirements should be recognized.

We appreciate all of the hard work that has gone into the present system design and look forward to discovering the economics behind the program.

Best Regards,

A handwritten signature in blue ink, appearing to read "Doug Pope", written over a horizontal line.

Doug Pope  
President