



August 18, 2020

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

To Whom it May Concern:

Thank you for the opportunity to submit comments on the proposed guidelines for the Clean Peak Energy Standard. SYSO Technologies is a software and services provider focused on optimization and operation of clean energy assets. We are excited to see this innovative program coming together and applaud the work that the DOER and others have put in over these past years to bring it to fruition.

Our comments are regarding the Distribution Circuit Multiplier Guideline. We understand that there is much work left to do to bring this component of the program to fruition, and the guideline leaves more than 2 years to do so. Nonetheless we encourage the DOER to include a grandfathering mechanism for projects that have an accepted Statement of Qualification Application so that the value of the distribution multiplier does not negatively change for a project that consists of investments made in part based on the value of CPS revenues. Any project that has an SQA accepted should be able to know its multiplier is fixed. In addition, it seems possible and perhaps likely that the conditions on an individual distribution circuit could change as a result of new assets being interconnected. For example:

A distressed circuit could have a multiplier of 2.0 due to peak load being near the circuit capacity. The constraint is eased after interconnection of a new storage asset and the multiplier is reset down to 1. The asset that relieved the constraint should continue to receive the higher multiplier even if subsequent projects do not.

Sincerely,

Nick Speyer
President & Co-Founder
SYSO Technologies