

9/4/2020

Patrick Woodcock
Commissioner, Massachusetts DOER
100 Cambridge St #1020
Boston, MA 02114

RE: Comments on Guidelines

I. Introduction

Zero-Point Development is pleased to offer the following comments on the Department of Energy Resources (“DOER”), Clean Peak Guidelines. Zero-Point is a family-owned solar-development company committed to advancing the progress of renewable energy solutions as a viable and economically-competitive resource alternative for all consumers in the United States. Having successfully developed and installed over 175MW, DC of solar capacity and 50MW of energy storage in the Commonwealth since 2011, we believe strongly in the independent and sustainable energy production-capacity of the Commonwealth. The Clean Peak Program (the “Program”) offers interesting and innovative opportunities for state agencies and the renewables development community to work together to assist Massachusetts in maintaining its renewable energy leadership role in the country and with meeting its future Clean Energy goals. In order for the Clean Peak Program to thoroughly recognize its potential, Zero Point offers the following comments to DOER.

II. Comments

a. Clean Peak Resource Eligibility Guideline.

DOER should amend the guidelines to incorporate a more descriptive definition of a “Stand Alone Energy Storage System” under subsection 3(c) title “Charging Coincident with High Renewable Energy Production”:

“A Stand Alone Energy Storage System (“SAESS”) shall be considered a Clean Peak Resources that qualifies for the Program by Charging Coincident with High Renewable Energy Production Only (meaning they are not co-located with an existing resource, qualified under any SREC Program or SMART Program and are truly stand-alone systems).”

Identifying and emphasizing the ability for a SAESS to participate in the Program will highlight the DOER’s commitment to being the nation’s leader in emerging storage policies and initiatives.



Eventually, the DOER should consider amending the regulations to allow for a SAESS to become eligible for its own Program multiplier equal to 3x. A SAESS provides many benefits that paired, co-located, or contractually obligated systems do not. A SAESS charging Coincident with High Renewable Energy Production has more flexibility to charge and dispatch on a schedule that places less of a burden on the grid and optimizes its ability to target peak events. If permitted its own multiplier, a SAESS would be able to financially operate independent of external Markets, concentrating solely on performance best suited for the Commonwealth's Clean Peak Standard.

I. **Multiplier Guidelines**

i. **Distribution Circuit Multiplier Guideline.**

Although we recognize DOER is hesitant to proceed with the Distribution Circuit Multiplier absent additional and sufficient data, Zero Point believes the DOER could expedite the implementation of this multiplier by adopting the following criteria as guidance immediately:

A Clean Peak Resource Shall be eligible for a Circuit Multiplier if the Clean Peak Resource is

1. AC coupled and qualifies as “dispatchable generators” in the ISO-New England forward capacity market and are either;
2. Sited on an existing 3-phase distribution circuits with DG capacity exceeding 8MW or 50% of the circuit's capacity, whichever is the lesser; and
3. Sited in areas where the peak load exceeds 60% of the circuits normal rating and can demonstrate that they have effectively reduced the 24hr peak load of the circuit where priority is given in order of EDC interconnection que.

If and when a distribution circuit is assigned an other-than-one multiplier, that multiplier shall apply to all Clean Peak Resources connected to that circuit regardless of their interconnection date, so long as those Clean Peak Resources are stand-alone systems and qualify for the Program by Charging Coincident with High Renewable Energy Production only.

ii. **Additional Multiplier Guidelines**

DOER should consider releasing additional Guidelines related to the other Multipliers; specifically the Actual Monthly System Peak Multiplier. Including a Guideline that provides a description and reasoning for the calculation of this multiplier amount allows the industry an opportunity



to comment and provide perspective on the actual performance of the storage system and if there is more economical way to financially incentivize participation in the Program. Additionally, a description providing transparency with information on how DOER decided on the multiplier could potentially reveal the opportunity to accommodate additional multipliers by slightly reducing the incentive level of the Actual Monthly System Peak Multiplier. A slight reduction to this multiplier could provide an opportunity to incentivize exclusivity of technologies to dedicate dispatch explicitly for the Program to assist and ensure the program attains the performance standards necessary for success.

III. Conclusion

Zero Point thanks the DOER for the opportunity to comment on the Clean Peak Standard's Guidelines, and respectfully requests that the DOER:

- Amend the guidelines to incorporate a more descriptive definition of a "Stand Alone Energy Storage System";
- Adopt the recommended Distribution Circuit Multiplier Guideline criteria immediately and release; and,
- Consider the creation of additional multipliers that can better support the success and sustainability of the Program.

Zero Point looks forward to continuing communication and collaboration with the DOER as the Clean Peak Program grows and is available to discuss these comments or other industry matters at the DOER's convenience.

Sincerely,



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