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SENT VIA ELETRONIC SUMBISSION

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

RE: Clean Peak Standard (CPS) Straw Proposal Comments

Dear Ms. Sergeant,

SRECTrade, Inc. appreciates the opportunity to provide commentary on the Clean Peak Standard (CPS) guidelines. We applaud the Department's continued efforts to decarbonize the grid and involve stakeholders in the implementation process of this exciting new program. Utilizing our experience in the Commonwealth's successful SREC programs over the last ten years, we believe we are in a position to provide insightful commentary throughout the process.

Electric Vehicle Supply Equipment (EVSE)

SRECTrade would urge the DOER to reconsider the framework in which EVSEs can generate CPS credits. As currently suggested, an EV would need to be plugged in but not charging for some duration of the peak, then receive some amount of credits for the charging activity after the peak. We believe that this methodology is not practical for the majority of EV charging activity and would result in limited participation from a soon to be major sector of demand response assets (EVSEs).

The main issue is the requirement that vehicle must be plugged in during the peak time. While this is a good way to ensure charging was intentionally avoided it seems unlikely that someone would leave their car plugged in for 1-4 hours, then start a charging session. This may be practical in some home charging situations, but this limits the option for one to use their vehicle during peak energy times. If a mechanism could be developed to simply incentivize charging outside of peak times EV owners could reduce load during peak and still have the benefit of clean transportation.

Additionally, it seems unlikely that EVSE network operators would be able to participate in this program given the requirement to be plugged in but not charging. In most public charging situations, an EV is plugged in because it needs a charge, and it is important that they can charge then move on to allow for others to charge. This is another sector of demand response assets that would be unlikely to participate given the proposed guidance.

SRECTrade recommends evaluating other credit calculation options for EVSEs that would result in more participation from this sector. One suggestion would be to evaluate a months' worth of charging sessions and to issue credits based on the average amount of time spent charging off peak. A minimum threshold could be established to ensure the charging sessions are not incidental and the incentive is changing behavior.

Given the amount of options available here and the growing importance of this asset class we recommend creating a working group to come up with an equitable solution.

Respectfully,

Tom Mackenty

Tom MacKenty

Director, Business Development

SRECTrade, Inc.