

September 4, 2020

VIA ELECTRONIC MAIL ONLY

Patrick Woodcock, Commissioner
Department of Energy Resources
100 Cambridge St #1020
Boston, MA 02114

Re: Clean Peak Standard Guidelines

Commissioner Woodcock:

As the Commonwealth of Massachusetts looks to achieve its greenhouse gas reduction goals, through measures such as the Clean Peak Standard, the millions of homes in Massachusetts should be seen as a key resource. Households are a critical vector of carbon emissions - but also one that can be rapidly decarbonized with existing technology, while saving those households thousands of dollars annually. The key is to electrify everything in the household and run it on clean energy. Not only does this cut down on an individual household's emissions but it also turns that household into a grid resource that can be leveraged to, for example, clean the peak.

Decarbonizing the residential sector not only includes switching heating, cooling, and cooking devices from fossil fuels to electricity, but also includes the decarbonization of over half of the transportation sector via electric vehicles - more than half of transportation sector emissions are caused by personal vehicles.

A fully electric home is better performing and more comfortable and it also costs less over the long term. A fully electrified household can save, on average, \$1,900 per year.¹ This is critical in a place like Massachusetts where lower income residents spend a disproportionate share of their income on the household energy burden.

¹ Saul Griffith et al., *Rewiring America A Field Manual for the Climate Fight* at p. 77 (July 29, 2020) available at <https://www.rewiringamerica.org/handbook>.

In New England, due to our reliance on fuel oil and natural gas for heating, and our high vehicle miles travelled, we have an even larger opportunity to squeeze out emissions from the residential sector than do other regions of the country. A fully electrified home, when combined with solar and batteries, will not only save residential customers money and cut our carbon emissions, but an electrified home can also clean the peak and strengthen the grid.

This is why we are encouraged by DOER robustly including residential demand response resources in the Clean Peak guidelines.

At a high level we would encourage DOER to consider treating the home as a single, unified demand resource rather than disaggregating - and metering - each individual device in the home. DOER should consider the ability of smart panels and other whole home metering as a means to monitor household performance. In addition, establishing a residential baseline for demand response measurement can be very difficult. Sunrun recommends DOER adopt alternative methods as recommended by Sunrun in prior comments in this proceeding.² Further, the program administrator should accept multiple forms of data as opposed to one stream. This creates a mechanism for a more open ecosystem and allows multiple vendors to integrate into the program.

Thank you for developing the nation's leading Clean Peak Program - we believe that it is an unparalleled opportunity to electrify homes in the Commonwealth and save ratepayers money while cutting our carbon emissions.

Respectfully submitted,

/s/ Chris Rauscher

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² See Sunrun Inc. Comments on Department of Energy Resources Clean Peak Standard Straw Proposal at pp. 4-5 (Apr. 12, 2019) (*e.g.*, providing recommendations to account for the unique operating characteristics of dispatchable solar + energy storage resources as compared to behavioral resources and why these distinctions are of critical importance when developing the measurement and verification methodologies to determine the capability of different demand response technologies to generate and deliver CPCs).