

RECURVE

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Kara Sergeant
Department of Energy Resources
100 Cambridge St.
Suite 1020
Boston, MA 02114
c/o doer.cps@mass.gov

Re: Clean Peak Standard Public Comments

Dear Ms. Sergeant,

Recurve appreciates the opportunity to provide comments on 225 CMR 21.00, the Clean Peak Energy Portfolio Standard. We are a software company that provides advanced measurement and verification (M&V) services to measure the hourly, daily, and monthly impacts of flexible demand resources--including energy efficiency--so that their full grid benefits can be recognized. We serve clients across North America and Australia, including work as a subcontractor to CLEAResult to deliver the Mass DOER Home Energy Market Value Performance (Home MVP) pilot.

We applaud the DOER's leadership in developing a Clean Peak Standard that recognizes the variable value of carbon-free energy. However, we know first-hand that passive demand response (DR), such as energy efficiency, can be a reliable and low-cost resource for delivering carbon-free energy at defined peak periods. The open-source CalTRACK methods provide a transparent mechanism for measuring the hourly impact of all behind-the-meter resources, including passive DR. These methods are being used by pay-for-performance programs in California to value peak-time savings at a higher rate than savings in other hours.

While the need for hourly interval data may be an impediment to including passive DR resources in the Clean Peak Standard until Massachusetts has state-wide implementation of Advanced Metering Infrastructure (AMI), we strongly encourage the DOER to begin

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sponsoring studies and pilots in those parts of the state that do have AMI or other interval meter data available, such as in the AMI pilot region of Worcester. This will give the DOER the opportunity to develop data requirements and measurement standards that will allow all resources to participate in this urgent effort to enable the cost-effective integration of renewable energy on the grid.

Thank you for the opportunity to comment on the CPS proposed regulation. Please contact me at (412) 759-1036 or Matt Golden (CEO) at (415) 902-4546 or matt@recurve.com

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Ethan', with a long horizontal flourish extending to the right.

Ethan Goldman