

October 30, 2019

Commissioner Judith Judson
Department of Energy Resources
100 Cambridge Street
Boston, MA 02114

Submitted electronically to: DOER.CPS@mass.gov

RE: Stakeholder Comment Regarding Clean Peak Standard Draft Regulations 225 CMR 21.00 et seq.

Dear Commissioner Judson:

On behalf of the Environmental League of Massachusetts (ELM) I appreciate the opportunity comment on the Department's Clean Peak Straw Standard Draft Regulations 225 CMR 21.00 et seq.

The urgent challenge to transition away from fossil fuels to a clean energy future demands ambitious solutions. We are encouraged by the Department's efforts to address clean alternatives to meet peak power demands. ELM believes that reducing peak demand and increasing renewable resources are necessary to combat climate change and reduce the need for additional fossil fuel infrastructure.

ELM offers comments on the following elements of the Clean Peak Standard Draft Regulations 225 CMR 21.00 et seq.:

1. Guidance documents
 - a. Because the draft regulations refer to as yet unpublished guidance documents that, among other things, will be critical to the evaluation of the types of resources eligible for the clean peak standard, commenting on the this proposal is extremely difficult. Therefore, ELM urges the DOER to extend the comment period so stakeholders can review the guidance documents in the context of this rule proposal.
2. Clean Peak Certificates (CPCs)
 - a. Multipliers – Policy Enhancement
 - i. DOER should consider policy enhancements similar to those under the SMART program regarding location of resources. Under SMART, solar resources located on brownfields or on existing buildings receive greater incentives than those located on greenfields. The same should hold true for the Clean Peak resources.

We thank you for considering our comments and look forward to working together to ensure responsibly developed clean peak resources a major role in the Commonwealth's energy future.

Sincerely,



Eric Wilkinson
General Counsel and Director of Energy Policy