

Good Afternoon,

Amp Energy provides these comments in response to the Notice of Public Review filed for the Massachusetts Clean Peak Energy Standard (CPES) on Sep 20th, 2019. We admire the effort from the Department of Energy Resources (DOER) staff to pioneer a program that incentivizes clean energy during peak demand periods, and provide six suggestions to make the program even more useful to small-scale solar developers, owners, and operators like us.

I. Minimum Standard Obligation Increase

Suggestion - We suggest that the DOER increase the minimum standard obligation for retail electricity suppliers to provide Clean Peak Energy Certificates (CPEC) from an increase of .25% per year to an increase of 2% per year for the next ten years.

- **Explanation** – The DOER currently proposes that the annual obligation on suppliers must increase by at least 0.25% per year, in accordance with the minimum set by [MA Acts 2018 Ch. 227](#). An increase of .25% per year pales in comparison to Massachusetts' other goals to advance clean energy. Signed by Governor Baker on Aug 9th, 2019, [H. 4857 An Act to Advance Clean Energy](#) mandates that retail supplies provide a minimum percentage of kilowatt-hours sales to end-use customers in the commonwealth from Class I renewable energy generating sources by (3) an additional 1% of sales each year thereafter until December 31, 2019; (4) an additional 2% of sales each year thereafter until December 31, 2029; and (5) an additional 1% of sales every year thereafter. We suggest that the DOER increase the annual obligation on suppliers to 2% per year between 2019 and 2029 to match the goals outlined in H. 4857. Doing so will set Massachusetts on track to continue being a national leader in the deployment of renewable resources.

II. Resilience Resource Qualifications

Suggestion - We suggest that the DOER further define the meaning of a Resilience Resource.

III. Existing or Contracted Resource Multiplier

- **Suggestion** - We suggest increasing this multiplier from 0.1 to 0.2.

IV. Distribution Circuit Multiplier

- **Suggestion** – We suggest providing stakeholders with a potential range for this multiplier.

V. Energy Storage Charging Window and Peak Periods

- **Suggestion** - We suggest specifying the time standard. We prefer all times to be mentioned in Eastern Standard Time (EST), instead of having EST and Eastern Day Time (EDT).

VI. Qualified Energy Storage System

- o **Suggestion** – We suggest clarifying the metric of measurement that energy storage primarily store renewable energy. If a percentage of renewable energy storing is recommended, please specify.

Please email Riley Hutchings at rhutchings@amp.energy if you have any questions regarding these comments. We look forward to receiving updates from the DOER concerning the CPES and hope to utilize the program in the near future.

All the Best,

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