

Samantha Meserve, Director
Renewable and Alternative Energy Division
Massachusetts Department of Energy Resources
100 Cambridge St., Suite 1020
Boston, MA 02114

Via electronic filing

November 18, 2022

Dear Director Meserve,

ECA Solar greatly appreciates the opportunity to submit these comments to the Department of Energy Resources (DOER) in response to the Draft Guideline for the Clean Peak Standard (CPS) Distribution Circuit Multiplier (DCM) issued on October 31, 2022. The most recent draft is significantly pared down from the straw proposal presented last winter. In pursuit of simplicity DOER loses an opportunity to realize significant circuit level benefits that the DCM can generate. ECA urges the DOER to reconsider some of the originally proposed design components of the DCM, and re-evaluate the proposal with further stakeholder input.

ECA Solar develops, engineers, installs, and operates large scale solar facilities across the US. ECA Solar takes an institutional approach to the solar energy industry. Our goal is to deploy the highest quality of solar power and energy storage projects to diversify the electric grid, while remaining risk averse and prioritizing safety. We value diversity and creativity to achieve the common goal of making solar energy more accessible to everyone. We're proud to have developed hundreds of acres of ground - mounted solar and over 6 million square feet of rooftop solar in 7 states.

The updated Guideline imposes several limitations on the availability of the DCM which will severely limit the ability of eligible Clean Peak Resources, but especially standalone Qualified Energy Storage Systems. First, the selection of only peak demand circuits, and moving away from solar saturated circuits misses an opportunity for Qualified Energy Storage Systems to provide real benefits to those circuits. Secondly, the limitation to only 1 MW of available capacity per circuit for the DCM is a facile approach to a measured rollout of the DCM, when a more tailored approach based on circuit level dynamics could bring greater benefits. Finally, the immediate disqualification for any resource that triggers a capacity upgrade is vague and could easily be a prohibitive criteria for most Clean Peak Resources.

The straw proposal lays out criteria for determining two types of eligible circuits- peak loaded circuits and solar saturated circuits. The selection criteria, and the eligible resources for each type of circuit, reflected the challenges facing two distinct circuit characteristics, and reflects the multiple ways a Clean Peak Resource could alleviate those issues. The newest Guideline not only presents a singular type of eligible circuit, it also does not specify which Clean Peak Resources may apply for the DCM on that circuit- only that they cannot exceed 1 MW and they cannot trigger an upgrade. By applying broad based eligibility criteria, the opportunity to highlight the benefits that specific Clean Peak Resources can provide to circuit level challenges is lost. Battery storage can provide real benefits to solar saturated circuits, and the existing

charging requirements for Qualified Energy Storage Systems ensure that the dispatch of that battery should not be coincident with high solar production. Furthermore, Energy Storage Interconnection Review Group has had multiple discussions on the subject and the EDCs are actively exploring imposing operational restrictions energy storage. These existing guardrails limit the dispatch of energy storage during suboptimal times. The DOER has never suggested that new generation should be qualified for the DCM on solar saturated circuits for good reason. However, certain Clean Peak Resources can provide real benefits to those circuits, and ECA Solar urges the DOER not to miss this opportunity.

The current proposal limits DCM eligibility to only 1 MW per circuit- meaning only 1 MW of capacity is eligible for the DCM, and only Clean Peak Resources sized 1MW or smaller may apply for the DCM. This limitation alone severely limits the availability of the DCM to most resources. Tailoring the available capacity based upon circuit dynamics would result in better outcomes for generators and for circuit level alleviation. Better to have fewer eligible circuits with more MW of available capacity than the limit of only 1 MW per circuit.

Finally, the prohibition of any Clean Peak Resource that triggers a capacity upgrade is a broad requirement that will prohibit most Resources from qualifying, while also ignoring the current state of the grid infrastructure and the methodology by which most EDCs study new Distributed Energy Resources. EDCs currently study both new distributed generation, and new energy storage systems, as new generation. The growth of energy storage continues to challenge the ways in which the utilities study and build the electric power system, and it is unusual in Massachusetts for any new resource to be able to interconnect without any system upgrade. Furthermore, the existing infrastructure deficit is a result of a lack of utility planning and investment to prepare for a decarbonized, distributed grid. It can both be true that an interconnecting clean energy resource triggers an upgrade, and that the targeted deployment of that resource can manage capacity growth and peak demand. The DCM is an important tool for targeted deployment of clean energy resources, and such a severe limitation limits the effectiveness of this policy mechanism.

ECA Solar appreciates the work that has been done by the DOER in thinking through and proposing novel policy solutions such as the Distribution Circuit Multiplier. We do encourage further stakeholder involvement and consideration before finalizing these rules, and look forward to working with the DOER in that endeavor. Please contact me if you have any questions.

Sincerely,

Kaitlin Kelly O'Neill
Director of Policy