

Electronic Filing

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Director Meserve,

On behalf of Convergent Energy + Power ("Convergent", "we"), I would like to thank the Department of Energy Resources ("the Department", "DOER", "Staff") for the opportunity to comment on the Distribution Circuit Multiplier (DCM) proposal under the Clean Peak Standard ("CPS") program. Convergent has remained a committed and active participant throughout the process, both as an independent contributor and as a member of policy organizations Northeast Clean Energy Coalition (NECEC) and RENEW Northeast. In light of the evolving discussion around multiplier design, I would like to submit the following comments for your consideration.

It is apparent that the latest draft ("October filing") is a departure from earlier iterations, following the Department's collaboration with local utilities and other unidentified parties. It is unclear to what extent the filing is meant to complement or replace earlier proposals, as some aforementioned topics were not acknowledged (intended DCM go-live, inclusion of environmental justice considerations, exclusive availability to storage assets, etc.). Below I largely adhere to the content of the October filing, though I hope to better understand the full breadth of the envisioned multiplier as conversations continue.

Multiplier Eligibility

As proposed, the artificial one megawatt limitation on the distribution circuit multiplier is both preventative of asset deployment and misaligned with the Clean Peak Standard program. No previous indications had been made to suggest the multiplier would be limited, especially so severely, per circuit. To broadly hamstring the program and the subset of eligible circuits to a mere megawatt of storage is to ignore the characteristics and issues of an individual circuit. Though it facilitates administrative review for the state and presiding utilities, this capacity limitation slows and threatens the efficiency of delivery of a demonstrated, feasible solution and technology.

Allotted size of DCM eligibility should instead be dictated by circuit needs—providing enough capacity and performance to suppress peaks or absorb excess solar, per the original circuit types identified. This of course will need to be appropriate relative to the anticipated multiplier aggregate cap each program year, which has not yet been articulated.

The proposed reservation period to provide Statement of Qualification (SoQ) is another deviation from previous drafts, which held SoQ submission to be the ultimate and certain qualifier following go-live of the DCM. Given the evolution of the multiplier since its introduction, the reservation period makes sense—though its success will be determined by establishing appropriate maturity requirements to dissuade speculative projects from slowing project deployment and skewing market signals.

Circuit Designation

Previous DCM frameworks sought to alleviate saturated circuits by addressing those experiencing measurable effects of peak load and photovoltaic saturation. This original intent would have expanded circuit headroom to additional solar, optimize existing distributed generation, and diminish grid stress in a pinpointed manner. Yet the October filing deviates

from this precedent, omitting the inclusion of solar-saturated circuits entirely. In light of the state's ongoing effort to articulate the technical potential of solar, efforts to leverage existing distributed solar to its greatest potential through development of sizable storage in localized areas should be enacted. Employing storage's ability to enable dynamic dispatch of variable energy sources can also curb overbuild as the state works toward decarbonizing its electricity system, by leveraging assets to their greatest potential. The inclusion of solar-saturated circuits, therefore, should be reinstated in the multiplier program.

It should be noted that the data source for circuit designation has changed in the latest filing, following over a year of continuity in proposed circuit designation methodology and data source. While we recognize that past issuances were clearly stated to be in draft and Staff previously acknowledged data source to be an area of potential further consideration, the proposed retrospective use of a three-year average conflicts with the DCM intent to deploy assets in a timely fashion relative to present-day grid conditions. Instead, the use of the latest annual Grid Modernization reports (or a commensurate equivalent) as previously proposed would allow development to be cited along more contemporary grid conditions.

Capacity Upgrade


The inclusion of a passing mention of ineligibility for projects triggering capacity upgrades is disturbingly vague. There is no indication of the extent of the capacity upgrade that would render a project ineligible—an imperative detail, given that many projects interconnecting to the distribution grid trigger an interconnection upgrade. This almost universal reality, paired with the fact that the assets are meant to effectively create headroom on the circuit by virtue of their operation, seems to condemn all projects. Too though, as argued above, the one megawatt limitation is antithetical to the program's purpose, the idea that a complying one megawatt asset would be later stripped of its multiplier because it triggers a capacity upgrade is both illogical and begs the question as to why the utility would include it on the eligible list of circuits in the first place.

Other Comments

In light of the considerable evolution of the DCM, we humbly request additional stakeholder session opportunities with other members of industry, Staff, utilities, and other participating parties to discuss these and other details. We encourage the Department to defer DCM final promulgation and enactment until early 2023, following appropriate engagement and issue resolution.

Thank you again to you and your colleagues for your continued engagement with a broad range of stakeholders throughout this and adjacent proceedings. We look forward to being involved in future discussions regarding the multiplier, and I encourage you to contact me should I be of assistance in clarifying the aforementioned. And thank you, as always, for your patience and commitment as we navigate these exciting themes together!

Most respectfully,



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