



VIA ELECTRONIC FILING

November 18, 2022

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

re: Bluewave Comments on Fall 2022 Distribution Circuit Multiplier Draft Guideline

Dear Director Meserve,

Bluewave appreciates the opportunity to submit comments to the Massachusetts Department of Energy Resources ("DOER") regarding the Draft Guideline for the Clean Peak Standard ("CPS") Distribution Circuit Multiplier ("DCM"). The Draft Guideline is a vastly different proposal than was last publicly presented and would essentially prohibit participation by front-of-the-meter ("FTM") energy storage, contrary to the state's storage deployment goals.

As a Massachusetts based solar and storage developer and owner/operator, BlueWave's vision is to protect our planet by transforming access to renewable energy. This includes standalone energy storage. Bluewave agrees with the comments submitted by the Northeast Clean Energy Council.

In 2018, Massachusetts adopted a 1,000 megawatt-hour ("MWh") by 2025 storage target. One of the goals of the state's Energy Storage Initiative is "Expanding markets for storage technologies, and valuing storage benefits to clean energy integration, grid reliability, system wide efficiency, and peak demand reduction."¹ The DCM has been conceived as an avenue to promote all of the aforementioned storage benefits. As such, developers like BlueWave have been eager to develop projects in areas of the grid that are experiencing solar saturation and peak load. The Draft Guideline, however, erodes the ability for energy storage to provide grid benefits to Massachusetts customers and would stymie the development of the storage market in the state. BlueWave urges DOER to reconsider the Draft Guideline and release for stakeholder comment an updated Draft Guideline that would align with the Commonwealth's storage goals and allow storage to utilize its unique flexible characteristics to deliver value to the grid.

Should DOER move forward with the current Draft Guideline, the Commonwealth would struggle to meet its 2025 energy storage target of 1,000 MWh. Much of the 885 MWh of energy storage that DOER reported to be in the pipeline as of February 2022 was likely being developed in anticipation of the DCM. This includes several BlueWave projects representing nearly half of the reported pipeline, all of which were anticipated to be eligible under the previous DCM proposals and none of which would be eligible under the Draft Guideline. BlueWave has been developing these resources to help facilitate the clean energy transition, locating projects on highly solar saturated circuits and circuits with peak loading concerns. We strongly believe that energy storage can deliver outsized ratepayer and public policy benefits when sited in areas experiencing peak loading concerns *and* areas experiencing increasing solar saturation. Storage, operated to alleviate solar saturation or peak loading, will be necessary to meet our

¹ <https://www.mass.gov/info-details/esi-goals-storage-target>

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climate commitments. For solar saturated circuits specifically, absorbing solar output during times of high generation will allow for additional renewable capacity on circuits and reduce interconnection costs, which allows for lower cost renewable deployment and, therefore, ratepayer savings. The DCM should be revised to incentivize the deployment of storage on solar saturated circuits and promote beneficial operation. The DCM is a rare opportunity to promote storage deployment and operation to achieve multiple public policy objectives.

Given the mercurial value of Clean Peak Energy Credits, the changes to the DCM proposal, and the hesitancy for investors to finance based on such an uncertain value, little of BlueWave's pipeline, or any developer's projects sited to provide grid benefits, would move forward without the DCM or some mechanism to support energy storage development in the state. Moving forward with the current Draft Guideline would set back the development of the Commonwealth's storage market. Therefore, we urge DOER to adopt the Northeast Clean Energy Council's recommendations.

Thank you for the opportunity to provide these comments. BlueWave is committed to energy storage as a critical component of a modern, reliable, and cost-effective grid and wishes to see the Commonwealth's policies promote storage deployment to create that future clean grid. The DCM Draft Guideline would stall storage development in the state and should be revised. Please contact me if you have any questions.

Sincerely,

/s/ Sean Burke

Sean Burke

Policy Manager

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