



**Via Electronic Mail**

November 18, 2022

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

Dear Ms. Meserve,

ENGIE North America Inc. (“ENGIE”) is pleased to submit these comments in response to the Department of Energy Resources’ (“Department”) release of the Clean Peak Energy Standard Distribution Circuit Multiplier Guideline (“DCM Guideline”). While ENGIE is pleased that the Department is committed to implementing a Distribution Circuit Multiplier (“DCM”), we are dismayed by some of the changes made from previous DCM proposals.

ENGIE is a subsidiary of ENGIE SA, a global energy company and leader in low-carbon energy and energy services with a mission to accelerate the transition towards a carbon-neutral world. ENGIE has been engaged in many aspects of the Massachusetts energy economy for decades. Most recently ENGIE is participating in the development and implementation of solar and battery storage resources in the Solar Massachusetts Renewable Target (SAMRT) program and the Clean Peak Standard (“CPS”) program. ENGIE is developing a significant pipeline of projects financed in part with reliance on the CPS program.

ENGIE supports the comments submitted by the Northeast Clean Energy Council (“NECEC”). We submit these complementary comments to emphasize certain areas of particular importance.

The CPS program provides an effective and targeted opportunity for clean energy developers to install and operate clean energy resources to the benefit of Massachusetts ratepayers and to the electric distribution grid. These clean technologies supply electricity or reduce demand during seasonal peak demand periods. Massachusetts is the first and only state to offer this unique program, which is a critical to assisting the state reach its clean energy goals.

In addition, the DCM specifically, is an opportunity to encourage developers to build incremental clean resources in locations on the grid of *particular need*. Unfortunately, the DCM Guideline as drafted will not encourage clean resources to be built in such areas.

Since the release of the Straw Proposal earlier this year ENGIE has been anticipating the DCM as a pathway to viability for our battery storage projects under development in the Commonwealth. Limiting the scope of applicability of the DCM in the way proposed in the Guideline will threaten the viability of the projects. Also, the Commonwealth is unlikely to meet its goal of 1,000 MWh of battery storage by 2025.

Further, ENGIE is dismayed that certain of the proposed changes seem to run counter to the intent of the DCM. Worse is that the changes mean that battery storage will not be deployed to optimize battery flexibility and grid enhancement. Therefore, ENGIE recommends that the Department consider the following changes to the DCM Guideline to improve the chances of success of both the CPS Program and the rollout of battery storage in the Commonwealth:

- The Department should reinsert solar saturated circuits for eligibility in DCM;
- The Department should not limit every eligible circuit to the same number of MWs as this policy does not recognize the status of each circuit; and
- The Department should clarify resource eligibility and recommend that only new resources be eligible for the DCM.

ENGIE thanks the Department for the opportunity to provide comments and recommendations on the DCM Guideline. ENGIE supports the Department's efforts to increase the impact of the CPS program by permitting program participants to offer services to the distribution system in points that require these services the most through the implementation of the DCM. To ensure the successful implementation of the DCM, ENGIE recommends that the Department consider our comments above.

ENGIE is available to discuss our comments further and looks forward to engaging with the Department as partners in reaching the Commonwealth's climate targets.

Sincerely,



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ENGIE North America  
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