

To: Thomas Ferguson of the Department of Energy Resources
From: Syncarpha Capital, LLC
Date: August 26, 2024

Re: Syncarpha Capital's Comments on the Clean Peak Energy Standard Emergency Rulemaking

Dear Thomas,

On behalf of Syncarpha Capital, LLC (Syncarpha), we thank the DOER for their continuous support on the Clean Peak Energy Standard and appreciate the opportunity to comment on the Emergency Rulemaking. Syncarpha is a distributed solar and storage developer based in the Northeast and with extensive experience developing and operating solar plus storage projects in Massachusetts under the SMART Program.

Changing the language “Commercial Operation Date” Eligibility Requirement for Qualified Energy Storage Systems to “Mechanical Completion”

Syncarpha supports mature milestone eligibility requirements as a threshold to qualify for the Near-Term Multiplier, however, due to current interconnection timelines, bottlenecks and Transmissions level constraints, the COD deadline creates too much uncertainty. Syncarpha believes changing the language from “Commercial Operation Date” to “Mechanical Completion” would alleviate some of the pressure and concerns from developers while keeping a realistic timeline. Developers have more control over the mechanical completion date while COD requires the utility to interconnect the project by the proposed deadline.

Adding Solar plus Storage systems under the Near-Term Resource Multiplier Eligibility Criteria

Syncarpha supports the inclusion of the Near-Term Resource Multiplier as part of an incentive mechanism under the Clean Peak Energy Standard. While Solar plus Storage systems are eligible to participate under the Clean Peak Energy Standard, the current rules exclude them as an eligible system under the Multiplier. Restricting this project segment under the current rules would further limit the growth of storage projects and slow the Commonwealth's goal of increasing clean energy during periods when net demand of electricity is the highest. For these reasons, we recommend the DOER to include solar plus storage systems as eligible under the Near-Term Resource Multiplier. If eligibility for the Multiplier is expanded to include solar plus storage projects, then DOER should re-evaluate the proposed reductions to the near-term CPS minimum standard to ensure that the market does not become over supplied.

We appreciate the opportunity to comment on the Clean Peak Energy Standard Emergency Rulemaking and look forward to submitting these written comments. Please free to reach out to us if you have any questions at development@syncarpha.com

Sincerely,

Chris Savastano
Chief Development Officer
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