

8/5/24

Samantha Meserve
Director, Renewable and Alternative Energy Division
Massachusetts Department of Energy Resources
100 Cambridge St, 9th Floor
Boston, MA 02114

RE: Comments on CPS Near-Term Resource Multiplier

Zero-Point Development is pleased to offer the following comments on the Department of Energy Resources (“DOER”), Clean Peak Guidelines as it relates to the Near-Term Resource Multiplier. For the Near-Term Resource Multiplier to provide assurance to applicants, Zero-Point offers the following comments to DOER.

1. DOER should implement a queue submission process for the Near-Term Resource Multiplier. This multiplier is intended to provide revenue certainty to continue to make the investment in near term projects. Without a reservation the project risks the program reaching its capacity limit prior to COD which doesn’t provide the revenue certainty as intended. Implementing a queue submission process would add confidence to developers regarding the economic issues these types of projects face in the short term. We ask that a Preliminary Statement of Qualification process be implemented with the Near-Term Resource Multiplier having only 50 megawatts of capacity and no developer allowed to have more than fifty percent of that capacity. Previous Preliminary Statement of Qualification processes have required the applicant to provide 1) an executed Interconnection Service Agreement 2) right to construct documentation and 3) non-ministerial permits for the project. We recommend maintaining these three requirements in the Near-Term Resource Multiplier application to receive a Preliminary Statement of Qualification.
2. DOER should revise the requirement of the Near-Term Resource Multiplier from “...must have a Commercial Operation Date before January 1, 2027” to “...must have a Commercial Operation Date or achieved mechanical completion and that interconnection depends only upon receipt of notice of authorization to interconnect from the Distribution Company before January 1, 2027”.



To satisfy this requirement, the project shall provide a Certificate of Completion signed by the local wiring inspector. Again, we stress the long and arduous path these projects have taken over the course of more than 4 years. A project achieving Commercial Operation by January 1, 2027 is not completely in the hands of the applicant. The applicant cannot foresee delays by the electric distribution companies, nor do they have the ability to control how long these upgrades take to complete. We feel there has been a long history with delays for interconnection that are outside of the control of an applicant. An applicant should not be withdrawn from queue if the applicant has done their part and the project is mechanically complete and awaiting Commercial Operation by January 1, 2027.

Zero-Point looks forward to continuing communication and collaboration with DOER as the Near-Term Resource Multiplier requirements are finalized. We are available to discuss these comments at DOER's convenience.

Sincerely,

Brendan Gove
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