



August 26, 2024

Via electronic filing: [doer.cps@mass.gov](mailto:doer.cps@mass.gov)

**RE: 2024 CPS EMERGENCY RULEMAKING**

August 26, 2024

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

Dear Ms. Meserve,

Nexamp appreciates the opportunity to comment on the 2024 Clean Peak Energy Standard Emergency Rulemaking issued on July 19, 2024, by the MA DOER.

As the largest developer, owner, and operator of community solar assets in the U.S., Nexamp has been at the forefront of efforts to make clean energy affordable and accessible for all Americans. Many of our community solar projects include energy storage. We are also developing a significant standalone energy storage pipeline across various jurisdictions. Nexamp has 35 MW of operational storage in Massachusetts and much more in its project pipeline. By managing all aspects of a project's lifecycle in-house—from development, engineering, and construction through operations and customer management—Nexamp brings rapid renewable energy deployment and high-quality jobs to the communities we serve. In 2015, Nexamp launched the first open-to-all community solar program that eliminates credit checks, up-front fees, and long-term commitments to help customers save up to 20% on annual electricity costs.

The emergency rulemaking made two changes to the 2024 CPS program, adjusted the minimum standard and added a near term resource multiplier. We support the comments submitted by NECEC and are also providing these additional comments below:

- 1. Minimum Standard Adjustments:** We understand the DOER's rationale for lowering the minimum standard in the near term to realize savings for ratepayers and better match. Additionally, increasing the minimum standard in later years provides storage projects certainty in their development process. Nexamp supports the adjustments to the minimum standard.
- 2. Near Term Resource Multiplier:** Nexamp strongly supports the implementation of a near term resource multiplier and offers a few adjustments to the timing and project requirements. We encourage DOER to consider expanding this multiplier beyond standalone storage to include storage that is co-located with solar PV. If DOER's goal is to add CPECs to the market quickly, opening this multiplier to all storage (standalone, solar paired, FTM, and BTM) would go further in achieving this goal. While solar +storage or BTM storage have more revenue stacking options through SMART and

ConnectedSolutions, storage in these situations would still benefit from the additional value of a multiplier. The expansion of the near-term resource multiplier to these types of projects would very likely push more storage across the finish line. We also encourage DOER to be open to increasing the 50MW cap as needed to allow all eligible projects to receive the multiplier. Additionally, we recommend adjusting the requirements of this multiplier to mechanical completion of a project, and the deadline to June 2027 for alignment with the capacity market obligation deadline. We plan to provide more detailed input by the September 13<sup>th</sup> comment deadline for the near-term resource multiplier guideline.

The July 19<sup>th</sup> emergency rulemaking has a narrow scope that targets current and near-term projects with its two immediate changes to CPS; however, it does not go far enough to encourage future storage development in the Commonwealth. We look forward to the full program review and following adjustments to the CPS program to incent storage deployment in the state. We understand that DOER will conduct a full CPS program review and rulemaking before the end of this year. We would like to take this opportunity to reiterate our comments on the CPS program filed on May 3, 2024 (attached). In those comments, we provided feedback that standalone storage is not economically viable with the current value provided by CPS. Standalone storage needs to either be paired with solar to participate in SMART or be behind-the-meter (BTM) and participate in ConnectedSolutions to justify development, and even in those cases, the economics are very tight. While the availability of all programs in the revenue stack is necessary to justify any storage development in Massachusetts, the introduction of a near term resource multiplier does help project economics. Nexamp encourages the DOER to consider a broader multiplier or adder for all storage beyond the near term in the full CPS program review. CPECs need to provide more value—whether through multipliers or higher CPEC prices—to achieve the program and Commonwealth storage deployment goals.

Please do not hesitate to reach out if there are any questions.

Thank you,

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