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August 26, 2024

Massachusetts Department of Energy Resources  
Clean Peak Energy Standard Public Hearing  
100 Cambridge St, 9th Floor  
Boston, MA 02114

**Re: Leap Comments on CPS Emergency Regulation Filed on July 19, 2024**

Leapfrog Power, Inc. ("Leap") would like to thank the Massachusetts Department of Energy Resources ("MA DOER") for the opportunity to participate as a stakeholder and submit public comment for the emergency regulations filed in July to the Massachusetts Clean Peak Energy Standard ("MA CPS") program.

Leap is a leading nationwide aggregator of distributed energy resources ("DERs"), with extensive experience participating over 150,000 assets in Virtual Power Plants ("VPPs") across markets in California, Texas, New York, and New England—including in the MA CPS program.

With respect to the decreases in Minimum Standard for 2024 - 2028, Leap understands that this is to shelter Massachusetts ratepayers from anticipated high Alternative Compliance Payment ("ACP") collection, which we certainly recognize is important. However, since the Minimum Standard is being increased 2029+, strong enablement of clean energy resources is needed now to mitigate long-term ratepayer protection from high ACP collection. While reducing the Minimum Standard over the next four years may alleviate near-term ratepayer burden as a band-aid solution, it risks recruitment and development of the clean peak resources that are needed to meet the program goals. Specifically, it risks dis-incentivizing investments in, deployments, and participation of clean energy resources—especially quickly deployable DERs—in the MA CPS program by reducing Clean Peak Energy Certificate ("CPEC") demand during anticipated CPEC market undersupply years. Said another way, the best solution to high prices is oftentimes temporary high prices, since they provide clear demand signals and spur new resource development. To mitigate these risks, we respectfully urge the MA DOER to develop solutions that target reduced enrollment barriers in MA CPS now—such as those for aggregations, as highlighted in Leap's public comment provided in May—and more equitably incentivize near-term clean peak resource



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deployment (see our comments on the Near-Term Resource Multiplier below) in parallel with the Minimum Standard changes.

With respect to the Near-Term Resource Multiplier, Leap is concerned that this multiplier is only available to front-of-the-meter storage resources. We appreciate the MA DOER releasing this multiplier to incentivize clean peak resource deployment now in order to avoid CPEC market undersupply in future years, but a clean energy future will require availability and participation of all clean peak resource classes. Therefore, we believe this multiplier should not favor one resource class over another. We respectfully urge the MA DOER to make the Near-Term Resource Multiplier available to all clean peak resource classes—including behind-the-meter storage and other DERs participating as demand response—rather than just front-of-the-meter storage. Doing so would avoid overextending the benefits of one clean peak resource class over another, and would create more equitable results.

As the MA CPS program continues to undergo review, grow, and develop to help Massachusetts meet its clean energy goals, we respectfully suggest the MA DOER consider program adjustments that are more sustainable for overall program goals rather than decreasing the Minimum Standard or only providing excess incentives to one resource class, including eliminating enrollment barriers and applying new multipliers universally.

Respectfully submitted,  
Nate Hua  
Manager of Market Revenue  
Leap