

Ferguson, Thomas (ENE)

From: ryanmcglothlin@siloelectric.com
Sent: Monday, July 29, 2024 3:23 PM
To: DOER CPS (ENE)
Subject: Public Comment on the Clean Peak Standard Near-Term Resource Multiplier

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

DOER has issued emergency rulemaking for the Clean Peak Standard, introducing the Near-Term Resource Multiplier (NTRM).

The NTRM is very important to our ability to obtain financing for stand-alone energy storage projects. It is therefore important that we be able to conclusively demonstrate to our financing partners that a project will indeed be eligible for this multiplier if it reaches completion prior to January 1, 2027. We propose that a similar methodology that was created for projects to qualify for the Distribution Circuit Multiplier be used for the NTRM. Namely, for a project to be able to reserve some of the 50MW of NTRM capacity, the project developer must be able to demonstrate that the project is truly "ready-to-build".

Therefore a project must have the following to be able to reserve a portion of the NTRM capacity:

- An executed Interconnection Service Agreement
- Right to construct documentation; and
- Non-ministerial permits.

In addition, we believe that projects should not be able to hold NTRM capacity indefinitely without demonstrating sufficient progress that would allow the project to reach COD prior to the Jan 1, 2027 deadline.

Therefore, a project should also demonstrate, within six months of it reserving NTRM capacity, that it has:

- Fully paid the costs associated with its interconnection upgrades in the executed ISA; and
- Obtained financing sufficient to build the project; or
- Placed firm equipment orders with deposits representing at least 10% of the expected total project construction costs.

If the NTRM capacity becomes over-subscribed, then DOER can establish a waiting list of projects that meet the requirements. If the NTRM capacity is over-subscribed at its inception, then the DOER should establish a fair process of allocating capacity, perhaps on a pro-rata basis. An NTRM capacity allotment should automatically pass with a project if a project is sold.

Finally, we believe that it is in the best interest of DOER and the wider community to make the list of NTRM-qualified and waitlisted projects publicly available with key information such as project location, size, date awarded NTRM, etc.

Regards,
Ryan

Ryan McGlothlin
Founder, Silo Electric

m 508.768.8054
w <https://siloelectric.com>