

November 18, 2024

Samantha Meserve
Renewable and Alternative Energy Division Director
Massachusetts Department of Energy Resources
100 Cambridge Street, 9th Floor
Boston MA, 02114
By Email: DOER.CPS@mass.gov

Re: CPS Emergency Regulation Comments

Brookfield Renewable¹ thanks the Department of Energy Resources (DOER) for the significant effort to review the Clean Peak Energy Standard (CPS) and develop Emergency Regulations, including those issued July 19, 2024 and October 11, 2024, respectively.

Brookfield Renewable strongly supports the Program revisions implemented by DOER through its Program review including i) enhancements to support long-term procurement of Clean Peak Energy Credits, ii) revisions to the Minimum Standard and iii) adjustments to the Alternative Compliance Price (ACP) structure. Taken together, these Program design changes should support increased resource deployment over the mid to long-term while mitigating near-term Program cost impacts as supply catches up to demand – significant improvements that ensure the CPS remains an integral Program for achieving the Commonwealth’s long-term policy goals.

Brookfield Renewable appreciates DOER’s consideration of its prior recommendations, alongside similar recommendations from many developers and other interested stakeholders, which has resulted in Program improvements that – coupled with the passage of S. 2967, will drive expanded resource participation over the life of the Program and reduce ratepayer impacts, particularly in the short-term. Brookfield Renewable is especially encouraged by the signals sent and certainty provided by the DOER through its adjustments to the ACP starting in 2025 and beyond, as well as the retention of existing Program Multipliers and related values. Furthermore, Brookfield Renewable is supportive of the adjustment to the Summer Seasonal Peak Period to better align resource performance with changing system conditions.

¹ Brookfield Renewable is a leading owner, operator and developer of renewable power, delivering innovative renewable power solutions that accelerate the world towards a sustainable, low-carbon future. In Massachusetts, our facilities include a 660MW pumped hydropower storage facility (Bear Swamp), a 10MW hydroelectric facility (Fife Brook) and a large fleet of affiliate-owned existing and proposed distributed solar generation.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Zuretti", with a stylized flourish at the end.

Steve Zuretti
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