

November 18, 2024

Thomas Ferguson
Department of Energy Resources
100 Cambridge Street, 9th Floor
Boston, MA 02114

SUBMITTED ELECTRONICALLY

CPS Public Comment

Re: Comments of Bloom Energy on 2024 CPS Follow-on Emergency Rulemaking

Dear Mr. Ferguson & the Clean Peak Energy Standard Team,

Bloom Energy Corporation (Bloom Energy) hereby respectfully submits the following comments in response to the Clean Peak Energy Standard (CPS) Emergency Rulemaking, released by the Department of Energy Resources (DOER) on October 11, 2024. Bloom Energy appreciates the opportunity to provide written input to inform the evolution of this important peak energy emissions mitigation program.

About Bloom Energy

Bloom Energy is a manufacturer of solid oxide fuel cell technology that utilizes an electrochemical process to power non-combustion microgrids as well as advanced electrolyzer systems capable of converting renewable electricity into renewable hydrogen. Our solid oxide fuel cells and electrolyzers are designed in a modular fault-tolerant format that provides mission critical reliability with no downtime for maintenance. Bloom Energy has installed over 1,200 of its non-combustion solid oxide fuel cell systems for customers in thirteen U.S. states as well as in Japan, South Korea, India, Italy and Taiwan with over 35 systems operating in Massachusetts. Our systems have proven resilient through grid outages caused by hurricanes, winter storms, earthquakes, forest fires, and other extreme weather and natural disasters. Bloom fuel cells are fuel flexible and can run on a number of fuel sources including natural gas, biogas, and hydrogen. The natural gas and biogas systems can be paired with carbon capture capabilities to further reduce greenhouse gas emissions, while a SOFC utilizing hydrogen produces no GHG emissions.

1. ACP Rate

We strongly support the changes DOER has made to the Alternative Compliance Payments (ACP). Given that not enough resources are currently available to meet existing program requirements, decreasing the ACP as originally intended would only further limit the amount of Clean Peak Energy Certificates (CPECs) available as paying the ACP would be more attractive financially. The plan to retain the ACP at \$45 through 2025 and increase it to \$65 for 2026 to 2032, before returning to \$45 in 2033 offers strong motivation for



Bloom Energy Corporation
4353 North First Street, San Jose, CA 95134
408 543 1500
www.bloomenergy.com

compliance entities to support installation of clean peak resources. Additionally, this spurs development exactly when it is needed most to meet near-term, 2030 climate goals established by the legislature.

2. CPEC Procurement

Bloom Energy agrees with the DOER's approach of reviewing procurement targets and proposing a staggered procurement schedule which was released in mid-November. As evidenced by the recent need for emergency rulemakings, adjustments to the procurement targets and procurement methodology are necessary in order to avoid considerable ACP payments impacting ratepayers without receiving the intended benefits of clean peak power.

3. CPEC Banked Compliance

We support the decision to align CPEC banking terms with the other renewable energy programs in Massachusetts, each with a two year window.

4. Summer Seasonal Peak Period

Bloom Energy is highly supportive of aligning the Summer Seasonal Peak Period with the observed peak windows of 4:00 to 8:00pm in the evening. Given the changing load profiles observed in Massachusetts and more broadly in ISO New England, it is vitally important for the CPS to make this adjustment ensuring that as many clean resources are producing power during the actual peak periods observed on the grid to further reduce emissions.

Thank you for your consideration of these comments and for supporting the robust stakeholder process that is underway. Please do not hesitate to reach out if we can provide additional information.

Sincerely,

/s/Maryette Haggerty Perrault

Maryette Haggerty Perrault
Senior Policy Manager, New England
Bloom Energy Corporation

(857) 408-8681

maryette.haggerty-perrault@bloomenergy.com

www.bloomenergy.com