



November 18, 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 October 11, 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 October 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.

Leap applauds the MA DOER for temporarily increasing the Alternative Compliance Payment ("ACP") to \$65 for the period of 2026-2032. This will serve as a stronger economic incentive to bring on the much needed resources to ensure peak demand is served with clean energy and meet program goals. Leap also supports the shifting of the Summer Seasonal Peak Period from 3:00 – 7:00 pm to 4:00 – 8:00 pm. As the grid evolves, it's important to ensure that the signals being sent to the market properly reflect the highest value periods for the grid. Lastly, we urge the MA DOER to develop solutions that target reduced enrollment barriers in MA CPS, as highlighted in Leap's public comment provided in May, in parallel with the above changes. These barriers continue to slow participation in the program and deployment of additional clean energy resources, in particular residential behind-the-meter storage.

Respectfully submitted,
Trevor McManamon
Head of Market Development and Regulatory Affairs
Leap